

**WILLIAM H. "PETE" and TERESA MANDLEY**

344. Plaintiff William H. "Pete" Mandley was born on July 29, 1961 Mesa, Arizona. He is married to Teresa Mandley. They live in Gilbert, Arizona. They have eight children, two of which are minors ages 11 and 14 years old.

345. Plaintiff William H. "Pete" Mandley played Wide Receiver and Kick Returner for the Detroit Lions from 1984 to 1988 and for the Kansas City Chiefs from 1989 to 1990.

346. Plaintiff William H. "Pete" Mandley suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

347. Plaintiff William H. "Pete" Mandley was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

348. Plaintiff William H. "Pete" Mandley suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including lack of focus, headaches, and memory loss.

**SHANTE CARVER**

349. Plaintiff Shante Carver was born on February 12, 1971 in Stockton, California. He lives in Mesa, Arizona.

350. Plaintiff Shante Carver played Defensive End for the Dallas Cowboys from 1994 to 1997.

351. Plaintiff Shante Carver suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

1 352. Plaintiff Shante Carver was not warned by the NFL, NFL Properties, Inc., or Riddell  
2 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
3 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
4 his current injury.

5 353. Plaintiff Shante Carver suffers from multiple past traumatic brain injuries that  
6 include but are not limited to his various problems including headaches, lack of focus, confusion,  
7 and short-term memory loss.

8  
9 **GEORGE and GENEVA GOEDDEKE**

10 354. Plaintiff George Goeddeke Carver was born on July 29, 1945 in Detroit, Michigan.  
11 He is married to Geneva Goeddeke. They live in White Lake, Michigan. They have five children,  
12 with the youngest age 18.

13 355. Plaintiff George Goeddeke played Offensive Guard for the Denver Broncos from  
14 1967 to 1974.

15 356. Plaintiff George Goeddeke suffered multiple concussions that were improperly  
16 diagnosed and improperly treated throughout his career as a professional football player in the  
17 NFL.

18 357. Plaintiff George Goeddeke was not warned by the NFL, NFL Properties, Inc., or  
19 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
20 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
21 causing his current injury.

22 358. Plaintiff George Goeddeke suffers from multiple past traumatic brain injuries that  
23 include but are not limited to his various problems including short-term memory loss.

24  
25 **JAMES MICHAEL "MIKE" and BEVERLEE SCHNITKER**

26 359. Plaintiff James Michael "Mike" Schnitker was born on December 30, 1946 in  
27 Langdon, Missouri. He is married to Beverlee Schnitker. They have three children.

1 360. Plaintiff James Michael "Mike" Schnitker played Offensive Guard for the Denver  
2 Broncos from 1969 to 1974.

3 361. Plaintiff James Michael "Mike" Schnitker suffered multiple concussions that were  
4 improperly diagnosed and improperly treated throughout his career as a professional football player  
5 in the NFL.

6 362. Plaintiff James Michael "Mike" Schnitker was not warned by the NFL, NFL  
7 Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related  
8 concussions or that the league-mandated equipment did not protect him from such injury. This was  
9 a substantial factor in causing his current injury.

10 363. Plaintiff James Michael "Mike" Schnitker suffers from multiple past traumatic brain  
11 injuries that include but are not limited to his various problems including memory loss.

12  
13 **CHRISTOPHER "CHRIS" CALLOWAY**

14 364. Plaintiff Christopher "Chris" Calloway was born on March 29, 1968 in Chicago,  
15 Illinois.

16 365. Plaintiff Christopher "Chris" Calloway played Wide Receiver for the Pittsburgh  
17 Steelers from 1990 to 1991, for the New York Giants from 1992 to 1998, for the Atlanta Falcons in  
18 1999, and for the New England Patriots in 2000.

19 366. Plaintiff Christopher "Chris" Calloway suffered multiple concussions that were  
20 improperly diagnosed and improperly treated throughout his career as a professional football player  
21 in the NFL.

22 367. Plaintiff Christopher "Chris" Calloway was not warned by the NFL, NFL Properties,  
23 Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or  
24 that the league-mandated equipment did not protect him from such injury. This was a substantial  
25 factor in causing his current injury.

1 368. Plaintiff Christopher "Chris" Calloway suffers from multiple past traumatic brain  
2 injuries that include but are not limited to his various problems including tingling in the head and  
3 neck, memory loss, and headaches.

4  
5 **THOMAS C. and EVELYN RANDOLPH**

6 369. Plaintiff Thomas C. Randolph, II was born on October 5, 1970 in Norfolk, Virginia.  
7 He is married to Evelyn Randolph. They live in McLean, Virginia. They have two children ages  
8 10 and 11 months.

9 370. Plaintiff Thomas C. Randolph played Defensive Back for the New York Giants from  
10 1994 to 1997, for the Cincinnati Bengals in 1998, and for the Indianapolis Colts in 1999.

11 371. Plaintiff Thomas C. Randolph suffered multiple concussions that were improperly  
12 diagnosed and improperly treated throughout his career as a professional football player in the  
13 NFL.

14 372. Plaintiff Thomas C. Randolph was not warned by the NFL, NFL Properties, Inc., or  
15 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
16 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
17 causing his current injury.

18 373. Plaintiff Thomas C. Randolph suffers from multiple past traumatic brain injuries that  
19 include but are not limited to his various problems including short-term memory loss and severe  
20 headaches.

21  
22 **GARY and TINA JONES**

23 374. Plaintiff Gary Jones was born on November 30, 1967 in San Augustine, Texas. He is  
24 married to Tina Jones. They live in Cedar Hill, Texas.

25 375. Plaintiff Gary Jones played Safety for the Pittsburgh Steelers from 1990 to 1994, and  
26 for the New York Jets from 1995 to 1996.

1 376. Plaintiff Gary Jones suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 377. Plaintiff Gary Jones was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 378. Plaintiff Gary Jones suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including depression, mood disorder, anxiety problems  
9 and memory loss.

10  
11 OTTIS "O.J." and WANDA ANDERSON

12 379. Plaintiff Ottis "O.J." Anderson was born on January 19, 1957 in West Palm Beach,  
13 Florida. He lives in Orange, New Jersey. He is married to Wanda.

14 380. Plaintiff O.J. Anderson played Running Back for the St. Louis Cardinals from 1979  
15 to 1985 and the New York Giants from 1986 to 1992. He is one of 22 Running Backs to rush for  
16 over 10,000 career yards. He is a two time All-Pro selection. He is a two time Super Bowl  
17 champion. He was selected as the MVP of Super Bowl XXV.

18 381. Plaintiff O.J. Anderson suffered multiple concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 382. Plaintiff O.J. Anderson was not warned by the NFL, NFL Properties, Inc., or Riddell  
22 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
23 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
24 his current injury.

25 383. Plaintiff O.J. Anderson suffers from multiple past traumatic brain injuries that  
26 include but are not limited to his various problems including Short term memory loss and  
27 headaches.

1  
2 **LEONARD and TASHA RUSSELL**

3 384. Plaintiff Leonard Russell was born on November 17, 1969. He was born in  
4 California. He currently lives in Riverside, California. He is married to Tasha Russell.

5 385. Plaintiff Leonard Russell played Running Back for the New England Patriots from  
6 1991 to 1993, Denver Broncos in 1994, St. Louis Rams in 1995 and San Diego Chargers in 1996.  
7 He was selected as the AP Offensive Rookie of the Year in 1991.

8 386. Plaintiff Leonard Russell suffered multiple concussions that were improperly  
9 diagnosed and improperly treated throughout his career as a professional football player in the  
10 NFL.

11 387. Plaintiff Leonard Russell was not warned by the NFL, NFL Properties, Inc., or  
12 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
13 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
14 causing his current injury.

15 388. Plaintiff Leonard Russell suffers from multiple past traumatic brain injuries that  
16 include but are not limited to his various problems including memory loss, headaches and blurry  
17 vision.

18  
19 **RORY GRAVES**

20 389. Plaintiff Rory Graves was born on July 21, 1963. He was born in Atlanta, Georgia.  
21 He currently lives in Doraville, Georgia.

22 390. Plaintiff Rory Graves played Offensive Tackle for the Oakland Raiders from 1988 to  
23 1991 and the Minnesota Vikings in 1993.

24 391. Plaintiff Rory Graves suffered multiple concussions that were improperly diagnosed  
25 and improperly treated throughout his career as a professional football player in the NFL.

26 392. Plaintiff Rory Graves was not warned by the NFL, NFL Properties, Inc., or Riddell  
27 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
28



1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 393. Plaintiff Rory Graves suffers from multiple past traumatic brain injuries that include  
4 but are not limited to his various problems including memory loss and headaches.

5  
6 **DAVID M. and MONICA WHITE**

7 394. Plaintiff David M. White was born on February 27, 1970. He is married to Monica  
8 White. He was born in Oak Ridge, Tennessee. He currently lives in New York with his wife,  
9 Monica.

10 395. Plaintiff David M. White played Line Backer for New England Patriots and Buffalo  
11 Bills between 1993 and 1997.

12 396. Plaintiff David M. White suffered multiple concussions that were improperly  
13 diagnosed and improperly treated throughout his career as a professional football player in the  
14 NFL.

15 397. Plaintiff David M. White was not warned by the NFL, NFL Properties, Inc., or  
16 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
17 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
18 causing his current injury.

19 398. Plaintiff David M. White suffers from multiple past traumatic brain injuries that  
20 include but are not limited to his various problems including memory loss, headaches and difficulty  
21 sleeping.

22  
23 **PHILIP and GAIL SMITH**

24 399. Plaintiff Philip Smith was born on April 28, 1961. He is married to Gail. He  
25 currently lives in Los Angeles, California. They have 3 children ages 13, 10 and 8 years old.

26 400. Plaintiff Philip Smith played Wide Receiver and Kick Returner for  
27 Baltimore/Indianapolis Colts, Philadelphia Eagles, and Los Angeles Rams from 1983 to 1989.

1 401. Plaintiff Philip Smith suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 402. Plaintiff Philip Smith was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 403. Plaintiff Philip Smith suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including Short Term Memory Loss.

9  
10 W. VERNON DEAN

11 404. Plaintiff W. Vernon Dean was born on May 5, 1959. He was born in Texas and  
12 currently lives in Missouri City, Texas. He has 2 children ages 28 and 12 years old.

13 405. Plaintiff W. Vernon Dean played Defensive Back for the Washington Redskins from  
14 1982 to 1988 and for the Seattle Seahawks in 1999. He won Super Bowl XVII and XXII.

15 406. Plaintiff W. Vernon Dean suffered multiple concussions that were improperly  
16 diagnosed and improperly treated throughout his career as a professional football player in the  
17 NFL.

18 407. Plaintiff W. Vernon Dean was not warned by the NFL, NFL Properties, Inc., or  
19 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
20 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
21 causing his current injury.

22 408. Plaintiff W. Vernon Dean suffers from multiple past traumatic brain injuries that  
23 include but are not limited to his various problems including Short Term Memory Loss and  
24 Headaches.

25  
26 ANTHONY "TONY" COVINGTON



1 409. Plaintiff Tony Covington was born on December 26, 1967. He was born in North  
2 Carolina. He currently lives in Philadelphia, Pennsylvania.

3 410. Plaintiff Tony Covington played Safety for the Tampa Bay Buccaneers from 1991 to  
4 1994 and Seattle Seahawks in 1995.

5 411. Plaintiff Tony Covington suffered multiple concussions that were improperly  
6 diagnosed and improperly treated throughout his career as a professional football player in the  
7 NFL.

8 412. Plaintiff Tony Covington was not warned by the NFL, NFL Properties, Inc., or  
9 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
10 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
11 causing his current injury.

12 413. Plaintiff Tony Covington suffers from multiple past traumatic brain injuries that  
13 include but are not limited to his various problems including Short Term Memory Loss and  
14 Buzzing Sounds in his Ears.

15  
16 **ANTHONY and VALERIE JONES**

17 414. Plaintiff Anthony Jones was born on May 16, 1960. He is married to Valerie and has  
18 2 children ages 17 and 13. He was born in Maryland and currently lives in Meridianville,  
19 Alabama.

20 415. Plaintiff Anthony Jones played Tight End for Washington Redskins from 1984 to  
21 1988, San Diego Chargers in 1988 and Dallas Cowboys in 1989. He won Super Bowl XXII.

22 416. Plaintiff Anthony Jones suffered multiple concussions that were improperly  
23 diagnosed and improperly treated throughout his career as a professional football player in the  
24 NFL.

25 417. Plaintiff Anthony Jones was not warned by the NFL, NFL Properties, Inc., or Riddell  
26 Defendants of the risk of long-term injury due to football-related concussions or that the league-

1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 418. Plaintiff Anthony Jones suffers from multiple past traumatic brain injuries that  
4 include but are not limited to his various problems including Headaches and Memory Loss.

5  
6 **STEVE and MARILYN REESE**

7 419. Plaintiff Steve Reese was born on January 7, 1952. He is married to Marilyn. He  
8 was born in Columbus, Georgia and currently lives in Stone Mountain, Georgia.

9 420. Plaintiff Steve Reese played Line Backer for the New York Jets from 1974 to 1976,  
10 Tampa Bay Buccaneers in 1976, Minnesota Vikings in 1977 and the Cleveland Browns in 1978.

11 421. Plaintiff Steve Reese suffered multiple concussions that were improperly diagnosed  
12 and improperly treated throughout his career as a professional football player in the NFL.

13 422. Plaintiff Steve Reese was not warned by the NFL, NFL Properties, Inc., or Riddell  
14 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
15 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
16 his current injury.

17 423. Plaintiff Steve Reese suffers from multiple past traumatic brain injuries that include  
18 but are not limited to his various problems including Headaches, poor vision and Memory Loss.

19  
20 **DONALD BESSILLIEU**

21 424. Plaintiff Donald Bessillieu was born on May 4, 1956. He lives in Columbus,  
22 Georgia.

23 425. Plaintiff Donald Bessillieu played Defensive Back for the Miami Dolphins from  
24 1979 to 1982, St. Louis Cardinals in 1983, and Oakland Raiders from 1983 to 1985.

25 426. Plaintiff Donald Bessillieu suffered multiple concussions that were improperly  
26 diagnosed and improperly treated throughout his career as a professional football player in the  
27 NFL.

1 427. Plaintiff Donald Bessilieu was not warned by the NFL, NFL Properties, Inc., or  
2 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
3 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
4 causing his current injury.

5 428. Plaintiff Donald Bessilieu suffers from multiple past traumatic brain injuries that  
6 include but are not limited to his various problems including Memory Loss, Headaches and  
7 confusion.

8  
9 **HAROLD L. and CAROLYN JACKSON**

10 429. Plaintiff Harold Jackson was born on January 6, 1946. He is married to Carolyn. He  
11 was born in Mississippi and he currently lives in Los Angeles, California. They have one child  
12 who is 18 years old.

13 430. Plaintiff Harold Jackson played Wide Receiver for the Los Angeles Rams in 1968,  
14 the Philadelphia Eagles from 1969 to 1972, Los Angeles Rams from 1973 to 1977, New England  
15 Patriots from 1978 to 1981, Minnesota Vikings in 1982, Seattle Seahawks in 1983 and New  
16 England Patriots in 1987. He is a 5 time Pro-Bowl Selection. He led the NFL in receiving yards in  
17 1969 and 1972.

18 431. Plaintiff Harold Jackson suffered multiple concussions that were improperly  
19 diagnosed and improperly treated throughout his career as a professional football player in the  
20 NFL.

21 432. Plaintiff Harold Jackson was not warned by the NFL, NFL Properties, Inc., or  
22 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
23 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
24 causing his current injury.

25 433. Plaintiff Harold Jackson suffers from multiple past traumatic brain injuries that  
26 include but are not limited to his various problems including severe Headaches and Memory Loss.

**TODD and SHANNON JOHNSON**

434. Plaintiff Todd Johnson was born on December 18, 1978. He is married to Shannon and they have 2 children ages 1 ½ years old and 2 months old. They reside in Sarasota, Florida.

435. Plaintiff Todd Johnson played Safety for the Chicago Bears from 2003 to 2006, St. Louis Rams from 2007 to 2009 and Buffalo Bills in 2009.

436. Plaintiff Todd Johnson suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

437. Plaintiff Todd Johnson was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

438. Plaintiff Todd Johnson suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including Memory Loss.

**CHRIS GOODE**

439. Plaintiff Chris Goode was born on September 17, 1963. He lives in Birmingham, Alabama. He has 3 children and their ages are 17, 15, and 14 years old.

440. Plaintiff Chris Goode played Defensive Back for the Indianapolis Colts from 1987 to 1994.

441. Plaintiff Chris Goode suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

442. Plaintiff Chris Goode was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

443. Plaintiff Chris Goode suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including memory loss and headaches.

**BRUCE and VANISHA WALKER**

444. Plaintiff Bruce Walker was born on July 18, 1972. He is married to Vanisha and has one child age 9 years old. They reside in Bellflower, California.

445. Plaintiff Bruce Walker played Defensive Tackle for the New England Patriots in 1994 to 1996 and was on the squad of the San Diego Chargers from 1998 to 1999.

446. Plaintiff Bruce Walker suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

447. Plaintiff Bruce Walker was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

448. Plaintiff Bruce Walker suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including retaining information, Short Term Memory Loss and Headaches.

**DERRICK S. "RICKY" REYNOLDS**

449. Plaintiff Ricky Reynolds was born on January 19, 1965. He has 3 children ages 18, 17 and 14 years old. He lives in Dade City, Florida.

450. Plaintiff Ricky Reynolds played Defensive Back for the Tampa Bay Buccaneers from 1987 to 1993 and the New England Patriots from 1994 to 1996.

451. Plaintiff Ricky Reynolds suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

452. Plaintiff Ricky Reynolds was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the

1 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
2 causing his current injury.

3 453. Plaintiff Ricky Reynolds suffers from multiple past traumatic brain injuries that  
4 include but are not limited to his various problems including Short Term Memory Loss, Dizziness  
5 and Ringing in his ears.

6  
7 **DAVID and BONNIE LEWIS**

8 454. Plaintiff David Lewis was born on October 15, 1952. He is married to Bonnie and  
9 has one child age 23 years old. They reside in Dover, Florida.

10 455. Plaintiff David Lewis played Line Backer for the Tampa Bay Buccaneers from 1977  
11 to 1982, San Diego Chargers from 1982 to 1983 and Los Angeles Rams from 1983 to 1984.

12 456. Plaintiff David Lewis suffered multiple concussions that were improperly diagnosed  
13 and improperly treated throughout his career as a professional football player in the NFL.

14 457. Plaintiff David Lewis was not warned by the NFL, NFL Properties, Inc., or Riddell  
15 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
16 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
17 his current injury.

18 458. Plaintiff David Lewis suffers from multiple past traumatic brain injuries that include  
19 but are not limited to his various problems including Memory Loss and Headaches.

20  
21 **RONNIE and SHERYL LIPPETT**

22 459. Plaintiff Ronnie Lippett was born on December 10, 1960. He was born in Florida.  
23 He is married to Sheryl and has 3 children. They reside in South Easton, Massachusetts.

24 460. Plaintiff Ronnie Lippett played Defensive Back for the New England Patriots from  
25 1983 to 1991. He was selected to the New England Patriots all 1980's team.



1 461. Plaintiff Ronnie Lippett suffered multiple concussions that were improperly  
2 diagnosed and improperly treated throughout his career as a professional football player in the  
3 NFL.

4 462. Plaintiff Ronnie Lippett was not warned by the NFL, NFL Properties, Inc., or Riddell  
5 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
6 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
7 his current injury.

8 463. Plaintiff Ronnie Lippett suffers from multiple past traumatic brain injuries that  
9 include but are not limited to his various problems including Memory Loss, Depression, Sleep  
10 problems and Post Traumatic Stress Disorder.

11  
12 **ROLAND and CARMEL JAMES**

13 464. Plaintiff Roland James was born on February 18, 1958. He was born in Ohio. He is  
14 married to Carmel and has 4 children. They reside in Sharon, Massachusetts.

15 465. Plaintiff Roland James played Defensive Back for the New England Patriots from  
16 1980 to 1990. He was selected to the New England Patriots all 1980's team.

17 466. Plaintiff Roland James suffered multiple concussions that were improperly diagnosed  
18 and improperly treated throughout his career as a professional football player in the NFL.

19 467. Plaintiff Roland James was not warned by the NFL, NFL Properties, Inc., or Riddell  
20 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
21 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
22 his current injury.

23 468. Plaintiff Roland James suffers from multiple past traumatic brain injuries that include  
24 but are not limited to his various problems including Memory Loss, Depression and Sleep  
25 problems.

26  
27 **MARK S. DUPER**

1 469. Plaintiff Mark S. Duper was born on January 25, 1959. He lives in Margate, Florida.  
2 He has five children, and two of them are ages 15 and 16 years old.

3 470. Plaintiff Mark S. Duper played Wide Receiver for the Miami Dolphins from 1982 to  
4 1992. He was selected to the Pro-Bowl three times. He was inducted into the Miami Dolphins  
5 Honor Roll:

6 471. Plaintiff Mark S. Duper suffered multiple concussions that were improperly  
7 diagnosed and improperly treated throughout his career as a professional football player in the  
8 NFL.

9 472. Plaintiff Mark S. Duper was not warned by the NFL, NFL Properties, Inc., or Riddell  
10 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
11 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
12 his current injury.

13 473. Plaintiff Mark S. Duper suffers from multiple past traumatic brain injuries that  
14 include but are not limited to his various problems including memory loss and headaches.

15  
16 **BRIAN and SARCA INGRAM**

17 474. Plaintiff Brian Ingram was born on October 31, 1959. He was born in Memphis,  
18 Tennessee. He is married to Sarca and they have 5 children. They reside in Stone Mountain,  
19 Georgia.

20 475. Plaintiff Brian Ingram played Line Backer for the New England Patriots from 1982  
21 to 1986 and the San Diego Chargers from 1987 to 1988.

22 476. Plaintiff Brian Ingram suffered multiple concussions that were improperly diagnosed  
23 and improperly treated throughout his career as a professional football player in the NFL.

24 477. Plaintiff Brian Ingram was not warned by the NFL, NFL Properties, Inc., or Riddell  
25 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
26 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
27 his current injury.

1 478. Plaintiff Brian Ingram suffers from multiple past traumatic brain injuries that include  
2 but are not limited to his various problems including Short Term Memory Loss, Headaches and  
3 Ringing in his ears.

4  
5 **ANTHONY "TONY" and TRUDY COLLINS**

6 479. Plaintiff Tony Collins was born on May 27, 1959. He is married to Trudy and has  
7 eight children of which two of them are minors ages 15 and 13 years old. They reside in  
8 Winterville, North Carolina.

9 480. Plaintiff Tony Collins played Running Back for the New England Patriots from 1981  
10 to 1989 and the Miami Dolphins in 1990. He was selected to the Pro Bowl in 1983.

11 481. Plaintiff Tony Collins suffered multiple concussions that were improperly diagnosed  
12 and improperly treated throughout his career as a professional football player in the NFL.

13 482. Plaintiff Tony Collins was not warned by the NFL, NFL Properties, Inc., or Riddell  
14 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
15 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
16 his current injury.

17 483. Plaintiff Tony Collins suffers from multiple past traumatic brain injuries that include  
18 but are not limited to his various problems including Memory Loss and Sleeping problems.

19  
20 **STEVE and ANGELA NELSON**

21 484. Plaintiff Steve Nelson was born on April 26, 1951. He was born in Farmington,  
22 Minnesota. He is married to Angela and has 5 children, with one of them is 5 years old. They  
23 reside in Middleboro, Massachusetts.

24 485. Plaintiff Steve Nelson played Line Backer for the New England Patriots from 1974 to  
25 1987. He was selected to the Pro Bowl three times. His jersey was retired by the New England  
26 Patriots.

1 486. Plaintiff Steve Nelson suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 487. Plaintiff Steve Nelson was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 488. Plaintiff Steve Nelson suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including Short Term Memory Loss, Headaches, vision  
9 problems, sleep problems, depression and anxiety attacks.

10  
11 **JAMES E. and SHALANE WILLIS**

12 489. Plaintiff James E. Willis was born on September 2, 1972. He is married to Shalane  
13 and has 3 children ages 15, 10 and 3 years old. They reside in Huntsville, Alabama.

14 490. Plaintiff James E. Willis played Line Backer for the Green Bay Packers from 1993 to  
15 1996, Philadelphia Eagles from 1996 to 1999 and Seattle Seahawks in 2000.

16 491. Plaintiff James E. Willis suffered multiple concussions that were improperly  
17 diagnosed and improperly treated throughout his career as a professional football player in the  
18 NFL.

19 492. Plaintiff James E. Willis was not warned by the NFL, NFL Properties, Inc., or  
20 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
21 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
22 causing his current injury.

23 493. Plaintiff James E. Willis suffers from multiple past traumatic brain injuries that  
24 include but are not limited to his various problems including Short Term Memory Loss,  
25 Headaches, and vision problems.

26  
27 **ANTHONY and PAULA HANCOCK**

1 494. Plaintiff Anthony Hancock was born on June 10, 1960. He was born in Cleveland,  
2 Ohio. He is married to Paula and they have 2 children. They currently reside in Knoxville,  
3 Tennessee.

4 495. Plaintiff Anthony Hancock played Wide Receiver for the Kansas City Chiefs from  
5 1982 to 1988.

6 496. Plaintiff Anthony Hancock suffered multiple concussions that were improperly  
7 diagnosed and improperly treated throughout his career as a professional football player in the  
8 NFL.

9 497. Plaintiff Anthony Hancock was not warned by the NFL, NFL Properties, Inc., or  
10 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
11 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
12 causing his current injury.

13 498. Plaintiff Anthony Hancock suffers from multiple past traumatic brain injuries that  
14 include but are not limited to his various problems including Short Term Memory Loss and  
15 Headaches.

16  
17 **JEFF BURRIS**

18 499. Plaintiff Jeff Burris was born on June 7, 1972. He was born in Rock Hill, South  
19 Carolina. He has 2 children ages 13 and 11 years old. He currently resides in Indianapolis,  
20 Indiana.

21 500. Plaintiff Jeff Burris played Defensive Back for the Buffalo Bills from 1994 to 1997,  
22 Indianapolis Colts from 1998 to 2001 and Cincinnati Bengals from 2002 to 2003.

23 501. Plaintiff Jeff Burris suffered multiple concussions that were improperly diagnosed  
24 and improperly treated throughout his career as a professional football player in the NFL.

25 502. Plaintiff Jeff Burris was not warned by the NFL, NFL Properties, Inc., or Riddell  
26 Defendants of the risk of long-term injury due to football-related concussions or that the league-

1 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
2 his current injury.

3 503. Plaintiff Jeff Burris suffers from multiple past traumatic brain injuries that include  
4 but are not limited to his various problems including Memory Loss, Depression, Headaches and  
5 difficulty speaking.

6  
7 **WILLIAM C. "BILL" AND SUSAN BRADLEY**

8 504. Plaintiff Bill Bradley was born on January 24, 1947. He is married to Susan and they  
9 reside in Spring Ranch, Texas.

10 505. Plaintiff Bill Bradley played Free Safety for the Philadelphia Eagles from 1969 to  
11 1976 and the St. Louis Cardinals in 1977. He was a 3 time Pro Bowl selection. In 1971 and 1972,  
12 he led the NFL in interceptions.

13 506. Plaintiff Bill Bradley suffered multiple concussions that were improperly diagnosed  
14 and improperly treated throughout his career as a professional football player in the NFL.

15 507. Plaintiff Bill Bradley was not warned by the NFL, NFL Properties, Inc., or Riddell  
16 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
17 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
18 his current injury.

19 508. Plaintiff Bill Bradley suffers from multiple past traumatic brain injuries that include  
20 but are not limited to his various problems including Memory Loss and Headaches.

21  
22 **KERRY and TANJA GOODE**

23 509. Plaintiff Kerry Goode was born on July 28, 1965. He is married to Tanja and they  
24 have 4 children ages 16, 14, 11 and 6 years old. They reside in Fairburn, Georgia.

25 510. Plaintiff Kerry Goode played Running Back for the Tampa Bay Buccaneers in 1988  
26 and the Miami Dolphins in 1989.



1 511. Plaintiff Kerry Goode suffered multiple concussions that were improperly diagnosed  
2 and improperly treated throughout his career as a professional football player in the NFL.

3 512. Plaintiff Kerry Goode was not warned by the NFL, NFL Properties, Inc., or Riddell  
4 Defendants of the risk of long-term injury due to football-related concussions or that the league-  
5 mandated equipment did not protect him from such injury. This was a substantial factor in causing  
6 his current injury.

7 513. Plaintiff Kerry Goode suffers from multiple past traumatic brain injuries that include  
8 but are not limited to his various problems including frequent Headaches and blurred vision.

9  
10 **RAYMOND and KIMBERLEY CLAYBORN**

11 514. Plaintiff Raymond Clayborn was born on January 2, 1955. He is married to  
12 Kimberley and they have 3 children ages 25, 15, and 12 years old. They reside in Katy, Texas.

13 515. Plaintiff Raymond Clayborn played Defensive Back for the New England Patriots  
14 from 1977 to 1989 and Cleveland Browns from 1990 to 1991. He was selected to the Pro-Bowl 3  
15 times. He is a memo

16 516. Plaintiff Raymond Clayborn suffered multiple concussions that were improperly  
17 diagnosed and improperly treated throughout his career as a professional football player in the  
18 NFL.

19 517. Plaintiff Raymond Clayborn was not warned by the NFL, NFL Properties, Inc., or  
20 Riddell Defendants of the risk of long-term injury due to football-related concussions or that the  
21 league-mandated equipment did not protect him from such injury. This was a substantial factor in  
22 causing his current injury.

23 518. Plaintiff Raymond Clayborn suffers from multiple past traumatic brain injuries that  
24 include but are not limited to his various problems including Short Term Memory Loss, headaches,  
25 buzzing in his ears, and sleep problems.

**STEVEN and SUSAN ZABEL**

519. Plaintiff Steven Zabel was born on March 20, 1948. He is married to Susan and they have 3 children. They reside in Edmond, Oklahoma.

520. Plaintiff Steven Zabel played Line Backer for the New England Patriots from 1970 to 1974, New England Patriots from 1975 to 1978 and Baltimore Colts in 1979.

521. Plaintiff Steven Zabel suffered multiple concussions that were improperly diagnosed and improperly treated throughout his career as a professional football player in the NFL.

522. Plaintiff Steven Zabel was not warned by the NFL, NFL Properties, Inc., or Riddell Defendants of the risk of long-term injury due to football-related concussions or that the league-mandated equipment did not protect him from such injury. This was a substantial factor in causing his current injury.

523. Plaintiff Steven Zabel suffers from multiple past traumatic brain injuries that include but are not limited to his various problems including frequent pain in his head, sleeping difficulties and memory loss.

**FIRST CAUSE OF ACTION**

**NEGLIGENCE- Monopolist**

**(As Against the NFL)**

524. Plaintiffs incorporate by reference paragraphs 1 through 523 as if fully set forth herein at length.

525. The NFL, by and through its monopoly power, has historically had a duty to invoke rules that protect the health and safety of its players and the public. Nevertheless, by its actions, it has violated California Business and Professional Code Section 17001 by engaging in practices that restrain the development of good science on the problem and epidemic of concussion injuries.

526. As a monopoly, the NFL has a duty to protect the health and safety of its players, as well as the public at large.

1 527. Throughout the history of the NFL, the NFL organization has consistently breached  
2 its duty to protect the health and safety of its players by failing to enact rules, policies and  
3 regulations to best protect its players.

4 528. The NFL breached its duty to its players, including Plaintiffs, to use ordinary care to  
5 protect the physical and mental health of players by failing to implement standardized post-  
6 concussion guidelines by failing to enact rules to decrease the risk of concussions during games or  
7 practices, and by failing to implement mandatory rules that would prevent a player who suffered a  
8 mild traumatic brain injury from re-entering a football game and being placed at further risk of  
9 injury.

10 529. Throughout its many years, the NFL has repeatedly established its duty to protect the  
11 health and safety of its players when known and foreseeable risk exists. Until August 14, 2007, the  
12 NFL failed to create and implement league-wide guidelines concerning the treatment and  
13 monitoring of players who suffer concussive brain injuries.

14 530. It has been well established since 1928 that repeated blows to the head can lead to  
15 CTE, commonly known as "punch drunk syndrome." Punch Drunk Syndrome has been prevalent  
16 in boxers who have repeatedly suffered concussions.

17 531. Despite the fact that other sporting associations exist, such as the National Hockey  
18 League and the World Boxing Association, which have decades ago established standardized  
19 association-wide concussion management rules, until August 14, 2007, the NFL failed to establish  
20 any guidelines or policies to protect the mental health and safety of its players.

21 532. Nonetheless, it took the NFL until June of 2010 to finally acknowledge the long-term  
22 risks associated with concussions, including dementia, memory loss, CTE and its related  
23 symptoms. At that time, the NFL warned active players of those risks. To date, the NFL has never  
24 warned any past players, including Plaintiffs, or the public of the long-term brain injury caused  
25 from concussions.

26 533. The NFL's failure to fulfill its duty to protect its players, the plaintiffs and the public,  
27 include, but are not limited to, the following failures:

- 1 (a) Failure to institute acclimation requirements or procedures to ensure
- 2 proper acclimation of the NFL players before they participate in practices
- 3 or games;
- 4 (b) Failure to regulate and monitor practices, games, equipment, and medical
- 5 care so as to minimize the long-term risks associated with concussive brain
- 6 injuries suffered by the NFL players, including Plaintiffs;
- 7 (c) Failure to require that an adequate concussive brain injury history be taken
- 8 of NFL players;
- 9 (d) Failure to ensure accurate diagnosis and recording of concussive brain injury
- 10 so the condition can be treated in an adequate and timely manner;
- 11 (e) Failure to invoke league-wide guidelines, policies, and procedures regarding
- 12 the identification and treatment of concussive brain injury, and the return to
- 13 play insofar as such matters pertain to concussive brain injury;
- 14 (f) Failure to properly inform the public and other American Rules Football leagues and
- 15 players of the health risks associated with concussive injury;
- 16 (g) Failure to license and approve the best equipment available that will reduce the
- 17 risk of concussive brain injury; and
- 18 (h) Failure to warn of the harm of repetitive concussion injuries.
- 19

20 534. The NFL breached its duty to protect the health and safety of its players by  
 21 subjecting NFL players to an increased risk of concussive brain injury.

22 535. The NFL failed to provide complete, current, and competent information and  
 23 directions to NFL athletic trainers, physicians, and coaches regarding concussive brain injuries and  
 24 its prevention, symptoms, and treatment.

25 536. If the NFL would have taken the necessary steps to oversee and protect the NFL  
 26 players, including Plaintiffs, by developing and implementing necessary guidelines, policies, and  
 27 procedures; providing reasonably safe helmets; and educating and training all persons involved  
 28

1 with the NFL Teams in the recognition, prevention, and treatment of concussive brain injuries, then  
2 NFL players, such as Plaintiffs, would not have suffered from the subject condition or the effects  
3 of that condition, would have recovered more rapidly, or would not have suffered long-term brain  
4 injuries.

5 537. Under all of the above circumstances, it was foreseeable that the NFL's violating its  
6 duties would cause or substantially contribute to the personal injuries suffered by Plaintiffs.

7 538. The NFL committed acts of omission and commission, which collectively and  
8 severally, constituted negligence. The NFL's negligence was a proximate and producing cause of  
9 the personal injuries and other damages suffered by Plaintiffs.

10 539. As a result of the personal injuries, Plaintiffs are entitled to damages, as alleged  
11 herein or allowed by law, from the NFL in an amount reasonably anticipated to exceed the  
12 jurisdictional minimum of \$25,000.

13  
14 **SECOND CAUSE OF ACTION:**

15 **NEGLIGENCE**

16 **(As Against the NFL)**

17 540. Plaintiffs incorporate by reference paragraphs 1 through 539 of this Complaint as if  
18 fully set forth herein at length.

19 541. The NFL has historically assumed an independent tort duty to invoke rules that  
20 protect the health and safety of its players, but it has violated Section 323 of the Restatement  
21 (Second) of Torts as adopted by the Courts in California.

22 542. Throughout the history of the NFL, the NFL organization has consistently exercised  
23 its duty to protect the health and safety of its players by implementing rules, policies and  
24 regulations in an attempt to best protect its players.

25 543. By enacting rules to protect the health and safety of its players, the NFL has  
26 repeatedly confirmed its duty to take reasonable and prudent actions to protect the health and safety  
27 of its players when known and foreseeable risks exist.

1        544. The NFL breached its duty to its players, including Plaintiffs, to use ordinary care to  
2 protect the physical and mental health of players by implementing standardized post-concussion  
3 guidelines and by failing to implement mandatory rules that would prevent a player who suffered a  
4 mild traumatic brain injury from re-entering a football game or practice.

5        545. Throughout the many years that the NFL has repeatedly established its duty to  
6 protect the health and safety of its players when known and foreseeable risks exist, until August 14,  
7 2007, the NFL failed to create and implement league-wide guidelines concerning the treatment and  
8 monitoring of players who suffer a concussive brain injury during a game.

9        546. It has been well established since 1928 that repeated blows to the head can lead to  
10 CTE, commonly known as "punch drunk syndrome." Punch Drunk Syndrome has been prevalent  
11 in boxers who have repeatedly suffered concussions.

12        547. Despite the fact that other sporting associations exist, such as the World Boxing  
13 Association, which have decades ago established standardized association-wide concussion  
14 management rules, until August 14, 2007, the NFL failed to establish any guidelines or policies to  
15 protect the mental health and safety of its players.

16        548. The NFL's failure to fulfill its assumed duty to protect its players includes but is not  
17 limited to the following failures:

- 18        (a) Failure to institute acclimation requirements or procedures to ensure proper  
19 acclimation of the NFL players before they participate in practices or games;
- 20        (b) Failure to regulate and monitor practices, games, rules, equipment, and medical care  
21 so as to minimize the long-term risks associated with concussive brain injuries  
22 suffered by the NFL players, including Plaintiffs;
- 23        (c) Failure to require that an adequate concussive brain injury history be taken of NFL  
24 players;
- 25        (d) Failure to ensure accurate diagnosis and recording of concussive brain injury so the  
26 condition can be treated in an adequate and timely manner;



- (e) Failure to invoke league-wide guidelines, policies, and procedures regarding the identification and treatment of concussive brain injury, and the return to play insofar as such matters pertain to concussive brain injury; and,
- (f) Failure to license and approve the best equipment available that will reduce the risk of concussive brain injury.

549. The NFL breached its assumed duty to protect the health and safety of its players by subjecting NFL players to an increased risk of concussive brain injury.

550. The NFL failed to provide complete, current, and competent information and directions to NFL athletic trainers, physicians, and coaches regarding concussive brain injuries and its prevention, symptoms, and treatment.

551. If the NFL would have taken the necessary steps to oversee and protect the NFL players, including Plaintiffs, by developing and implementing necessary guidelines, policies, and procedures; providing reasonably safe helmets; and educating and training all persons involved with the NFL Teams in the recognition, prevention, and treatment of concussive brain injuries, then NFL players, such as Plaintiffs, would not have suffered from the subject condition or the effects of that condition, would have recovered more rapidly, or would not have suffered long-term brain damage, dementia, and depression related to dementia and CTE.

552. Under all of the above circumstances, it was foreseeable that the NFL's violations of its duties would cause or substantially contribute to the personal injuries suffered by the Plaintiffs.

553. The NFL committed acts of omission and commission, which collectively and severally, constituted negligence. The NFL's negligence was a proximate and producing cause of the personal injuries and other damages suffered by Plaintiff.

554. As a result of the personal injuries of Plaintiffs, they are entitled to damages, as alleged herein or allowed by law, from the NFL in an amount reasonably anticipated to exceed the jurisdictional minimum of \$25,000.

**THIRD CAUSE OF ACTION:**

**FRAUD**

**(As Against the NFL)**

555. Plaintiffs incorporate by reference paragraphs 1 through 554 of this Complaint as if fully set forth herein at length.

556. From 2005 through June of 2010, the NFL made through its "Mild Traumatic Brain Injury Committee" and others, its agents, material misrepresentations to its players, former players, the Congress and the public at large that there was no link between concussions and later life cognitive/brain injury, including CTE and its related symptoms.

557. The persons who made the misrepresentations as agents of the NFL and the NFL knew they were false.

558. The persons who made the misrepresentations as agents of the NFL and the NFL intended to defraud, among others, the Plaintiffs in this action.

559. The Plaintiffs, among others, justifiably relied on these misrepresentations to their detriment in getting care for their injuries.

560. The Plaintiffs, among others, were damaged by these misrepresentations. Among other things, they require increased home care, loss of consortium, loss of employment, medical costs and pain and suffering.

561. As a result of the personal injuries of Plaintiffs, they are entitled to damages, as alleged herein or allowed by law, from the NFL in an amount reasonably anticipated to exceed the jurisdictional minimum of \$25,000.

**FOURTH CAUSE OF ACTION**

**NEGLIGENCE**

**(As Against NFL Properties)**

562. Plaintiffs incorporate by reference paragraphs 1 through 561 as if fully set forth herein at length.

1 563. NFL Properties breached its duty to ensure that the equipment it licensed and  
2 approved were of the highest possible quality and sufficient to protect the NFL players, including  
3 Plaintiffs, from the risk of concussive brain injuries.

4 564. NFL Properties breached its duty by licensing the Riddell Defendants' helmets, and  
5 approving and/or requiring the use of the helmets for the NFL players, knowing or having reason to  
6 know that the helmets were negligently and defectively designed and/or manufactured.

7 565. As a result of these breaches by NFL Properties, Plaintiffs suffer personal injuries as  
8 a result the long-term health effects of concussive brain injuries.

9 566. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages  
10 from NFL Properties, LLC in an amount reasonably anticipated to exceed the jurisdictional  
11 minimum of \$25,000.00.

12  
13 **FIFTH CAUSE OF ACTION**  
14 **STRICT LIABILITY FOR DESIGN DEFECT**  
15 **(As Against Riddell Defendants)**

16 567. Plaintiffs incorporate by reference paragraphs 1 through 566 as if set fully herein at  
17 length.

18 568. At the time the helmets were designed, manufactured, sold, and distributed by the  
19 Riddell Defendants, the helmets were defective in design, unreasonably dangerous, and unsafe for  
20 their intended purpose because they did not provide adequate protection against the foreseeable  
21 risk of concussive brain injury. The design defect includes, but is not limited to the following:

- 22 (a) Negligently failing to design the subject helmet with a safe means  
23 of attenuating and absorbing the foreseeable forces of impact in  
24 order to minimize and/or reduce the forces and energy directed to  
25 the player's head;  
26 (b) Negligently designing the subject helmet with a shock attenuating  
27 system which was not safely configured;  
28

- (c) Negligently failing to properly and adequately test the helmet model;
- (d) Other acts of negligence that may be discovered during the course of this matter; and
- (e) Failing to warn Plaintiffs that their helmets would not protect against the long-term health consequences of concussive brain injury.

569. The defective design and unreasonably dangerous condition were a proximate and producing cause of the personal injuries suffered by the Plaintiffs and other damages, including but not limited to, economic damages and non-economic damages.

570. The Riddell Defendants are strictly liable for designing a defective and unreasonably dangerous product and for failing to warn which were proximate and producing causes of the personal injuries and other damages including, but not limited to, economic damage as alleged herein. A safer alternative design was economically and technologically feasible at the time the product left the control of the Riddell Defendants.

571. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages from Riddell Defendants in an amount reasonably anticipated to exceed the jurisdictional minimum of \$25,000.00.

### SIXTH CAUSE OF ACTION

#### (STRICT LIABILITY FOR MANUFACTURING DEFECT)

##### (As Against Riddell Defendants)

572. Plaintiffs incorporate by reference paragraphs 1 through 571 as if set forth herein at length.

573. At the time the helmets were designed, manufactured, sold and distributed by the Riddell Defendants, the helmets were defective in their manufacturing and unreasonably dangerous and unsafe for their intended purpose because they did not provide adequate protection against the

foreseeable risk of concussive brain injury. The Riddell Defendants' failure to design the helmets to design and manufacturing specifications resulted in, among other things, the following:

- (a) Negligently failing to manufacture the subject helmet with a safe means of attenuating and absorbing the foreseeable forces of impact in order to minimize and/or reduce the forces and energy directed to the player's head;
- (b) Negligently manufacturing the subject helmet with a shock attenuating system which was not safely configured;
- (c) Negligently failing to properly and adequately inspect and/or test the helmet model;
- (d) Other acts of negligence that may be discovered during the course of this matter; and
- (e) Failure to warn Plaintiffs that its helmets wouldn't protect against concussive brain injury.

574. The manufacturing defect was a proximate and producing cause of the personal injuries suffered by Plaintiffs and other damages, including but not limited to, economic damages and non-economic damages.

575. The Riddell Defendants are strictly liable for manufacturing and placing in the stream of commerce a defective and unreasonably dangerous product which was a proximate and producing cause of the personal injuries and other damages, including but not limited to, economic damages and non-economic damages. A safe alternative design was economically and technologically feasible at the time the product left the control of the Riddell Defendants.

576. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages from Riddell Defendants in an amount reasonably anticipated to exceed the jurisdictional minimum of \$25,000.00.

**SEVENTH CAUSE OF ACTION**

**FAILURE TO WARN**

**(As Against Riddell Defendants)**

577. Plaintiffs incorporate by reference paragraphs 1 through 576 as if set forth herein at length.

578. The Riddell Defendants failed to provide necessary and adequate safety and instructional materials and warnings of the risk and means available to reduce and/or minimize the risk of concussive brain injuries while playing football.

579. The Riddell Defendants failed to provide necessary and adequate information, warnings, and/or instructional materials regarding the fact that other model helmets provided greater shock attenuation from blows to the head area.

580. The Riddell Defendants' failure to warn caused the Plaintiffs' personal injuries.

581. As a result of the personal injuries of Plaintiffs, Plaintiffs are entitled to damages from the Riddell Defendants, in an amount reasonably anticipated to exceed the jurisdictional minimum of \$25,000.00.

**EIGHTH CAUSE OF ACTION**

**NEGLIGENCE**

**(As Against Riddell Defendants)**

582. Plaintiffs incorporate by reference paragraphs 1 through 581 as if set forth herein at length.

583. The Riddell Defendants should have been well aware that since 1928 repeated blows to the head can lead to CTE, commonly known as "punch-drunk syndrome".

584. The Riddell Defendants breached their duty of reasonable care by failing to provide necessary and adequate safety and instructional materials and warnings of the risk and means available to reduce and/or minimize the risk of concussive brain injuries while playing football using their helmets.



1 585. As a result of the Riddell Defendants' breach of duty, Plaintiffs have sustained  
2 permanent injury.

3 586. For the personal injuries of Plaintiffs, Plaintiffs are entitled to damages from the  
4 Riddell Defendants in an amount reasonably anticipated to exceed the jurisdictional minimum of  
5 \$25,000.00.

6  
7 **NINTH CAUSE OF ACTION**

8 **LOSS OF CONSORTIUM**

9 **(As Against All Defendants)**

10 587. Plaintiffs incorporate by reference paragraphs 1 through 586 as if set forth herein at  
11 length.

12 588. As a direct and proximate result of the carelessness, negligence and recklessness of  
13 all Defendants and of the aforesaid injuries to their husbands, the wife Plaintiffs have been  
14 damaged as follows:

- 15 a. They have been and will continue to be deprived of the services,  
16 society and companionship of their husbands;  
17 b. They have been and will continue to be required to spend money  
18 for medical care and household care for the treatment of their  
19 husbands; and  
20 c. They have been and will continue to be deprived of the earnings of  
21 their husbands.

22  
23 589. As a result of the injuries to Plaintiffs, wife Plaintiffs are entitled to damages from  
24 the Defendants, in an amount reasonably anticipated to exceed the jurisdictional minimum of  
25 \$25,000.00.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiffs pray for judgment against Defendants, and each of them, as follows:

1. For compensatory and general damages according to proof;
2. For special and incidental damages according to proof;
3. For punitive damages according to proof;
4. For costs of the proceedings herein; and
5. For all such other and further relief as the Court deems just.

DATED: July 19, 2011

**GIRARDI | KEESE**

BY: 

THOMAS V. GIRARDI  
Attorney for Plaintiffs

**JURY DEMAND**

Plaintiffs hereby demand a trial by jury on all claims so triable.

DATED: July 19, 2011

**GIRARDI | KEESE**

BY: 

THOMAS V. GIRARDI  
Attorney for Plaintiffs

ORIGINAL

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>THOMAS V. GIRARDI, SBN 36603</b> <b>GIRARDI KEESE</b> <b>1126 Wilshire Boulevard</b> <b>Los Angeles, California 90017-1904</b>		FOR COURT USE ONLY <b>FILED</b> <b>SUPERIOR COURT OF CALIFORNIA</b> <b>COUNTY OF LOS ANGELES</b>  <b>JUL 19 2011</b>  John A. Chase, Executive Officer/Clerk BY <u>[Signature]</u> Deputy
TELEPHONE NO.: 213/977-0211 ATTORNEY FOR (Name): <b>Plaintiffs</b>	FAX NO.: 213/481-1554	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: SAME AS ABOVE CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		
CASE NAME: <b>Maxwell, et al. v. National Football League, et al.</b>		
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)
		CASE NUMBER: <b>BC 465842</b>  JUDGE: DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case: <b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (48) <b>Other P/DPD/W (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input checked="" type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other P/DPD/W (23) <b>Non-P/DPD/W (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-P/DPD/W tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation</b> (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. ☐ Large number of separately represented parties    d. ☐ Large number of witnesses
- b. ☐ Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve    e. ☐ Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- c. ☐ Substantial amount of documentary evidence    f. ☐ Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. ☒ monetary    b. ☐ nonmonetary; declaratory or injunctive relief    c. ☒ punitive
4. Number of causes of action (specify): 9
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: July 19, 2011

THOMAS V. GIRARDI

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

## NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 3

Form Adopted for Mandatory Use,  
Judicial Council of California  
CM-010 (Rev. July 1, 2007)

CIVIL CASE COVER SHEET

Legal  
Solutions  
C. 1.15

Cal. Rules of Court, rules 2.30, 3.220, 3.400-3.403, 3.740;  
Cal. Standards of Judicial Administration, std. 3.10

BY FAX

Ex A\_000101

ORIGINAL

SHORT TITLE: Maxwell, et al. v. National Football League, et al.	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

BY FAX

This form is required pursuant to Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? ☒ YES CLASS ACTION? ☐ YES LIMITED CASE? ☐ YES TIME ESTIMATED FOR TRIAL 14 ☐ HOURS/ ☒ DAYS

Item II. Indicate the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

**Step 1:** After first completing the Civil Case Cover Sheet form, find the main Civil Case Cover Sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

**Step 2:** Check one Superior Court type of action in Column B below which best describes the nature of this case.

**Step 3:** In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Local Rule 2.0.

**Applicable Reasons for Choosing Courthouse Location (see Column C below)**

- |  |  |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, central district. | 6. Location of property or permanently garaged vehicle.    |
| 2. May be filed in central (other county, or no bodily injury/property damage).  | 7. Location where petitioner resides.                      |
| 3. Location where cause of action arose.   | 8. Location wherein defendant/respondent functions wholly. |
| 4. Location where bodily injury, death or damage occurred.                       | 9. Location where one or more of the parties reside.       |
| 5. Location where performance required or defendant resides.                     | 10. Location of Labor Commissioner Office                  |

**Step 4:** Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (48)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2. 2.
	Product Liability (24)	<input checked="" type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 4. 1., 4.
	Other Personal Injury/Property Damage/Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 4.
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1., 4.
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 4.	

SHORT TITLE: <b>Maxwell, et al. v. National Football League, et al.</b>	CASE NUMBER
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Non-Personal Injury/Property Damage/Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A8029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 3.
	Civil Rights (08)	<input type="checkbox"/> A8005 Civil Rights/Discrimination	1., 2., 3.
	Defamation (13)	<input type="checkbox"/> A8010 Defamation (slander/libel)	1., 2., 3.
	Fraud (16)	<input type="checkbox"/> A8013 Fraud (no contract)	1., 2., 3.
	Professional Negligence (25)	<input type="checkbox"/> A8017 Legal Malpractice <input type="checkbox"/> A8050 Other Professional Malpractice (not medical or legal)	1., 2., 3. 1., 2., 3.
	Other (35)	<input type="checkbox"/> A8025 Other Non-Personal Injury/Property Damage tort	2., 3.
Employment	Wrongful Termination (36)	<input type="checkbox"/> A8037 Wrongful Termination	1., 2., 3.
	Other Employment (15)	<input type="checkbox"/> A8024 Other Employment Complaint Case <input type="checkbox"/> A8109 Labor Commissioner Appeals	1., 2., 3. 10.
Contract	Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A8004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A8008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A8019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A8026 Other Breach of Contract/Warranty (not fraud or negligence)	2., 6. 2., 5. 1., 2., 5. 1., 2., 5.
	Collections (09)	<input type="checkbox"/> A8002 Collections Case-Seller Plaintiff <input type="checkbox"/> A8012 Other Promissory Note/Collections Case	2., 5., 8. 2., 5.
	Insurance Coverage (18)	<input type="checkbox"/> A8015 Insurance Coverage (not complex)	1., 2., 5., 8.
	Other Contract (37)	<input type="checkbox"/> A8009 Contractual Fraud <input type="checkbox"/> A8031 Tortious Interference <input type="checkbox"/> A8027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1., 2., 3., 5. 1., 2., 3., 5. 1., 2., 3., 8.
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
	Wrongful Eviction (33)	<input type="checkbox"/> A8023 Wrongful Eviction Case	2., 8.
Real Property	Other Real Property (26)	<input type="checkbox"/> A8018 Mortgage Foreclosure <input type="checkbox"/> A8032 Quiet Title <input type="checkbox"/> A8060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6. 2., 6. 2., 6.
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A8021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A8020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer	Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A8020F Unlawful Detainer-Post-Foreclosure	2., 6.
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A8022 Unlawful Detainer-Drugs	2., 6.

11/61/23

LACIV 109 (Rev. 03/11)  
LASC Approved 03-04CIVIL CASE COVER SHEET ADDENDUM  
AND STATEMENT OF LOCATIONLocal Rule 2.0  
Page 2 of 4

Ex A\_000103



SHORT TITLE: Maxwell, et al. v. National Football League, et al.

CASE NUMBER

Judicial Review

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Case Category (Number)	B Case Description (Number)	C Check Box (Number)
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2., 8. 2. 2.
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 9. 2., 6. 2., 9. 2., 8. 2., 8. 2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8. 2., 8. 1., 2., 8. 1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2., 3., 9. 2., 3., 8. 2., 3., 9. 2. 2., 7. 2., 3., 4., 8. 2., 9.



SHORT TITLE: Maxwell, et al. v. National Football League, et al.	CASE NUMBER
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Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected for this case.  <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.	ADDRESS: 3556 South Van Ness Ave
CITY: Los Angeles	STATE: CA      ZIP CODE: 90018

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the SUPERIOR courthouse in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., § 392 et seq., and Local Rule 2.0, subds. (b), (c) and (d)].

Dated: July 19, 2011

  
 (SIGNATURE OF ATTORNEY/FILING PARTY)  
 THOMAS V. GIRARDI

**PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:**

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 03/11).
5. Payment in full of the filing fee, unless fees have been waived.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

11/26/12

CIV-110

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): THOMAS V. GIRARDI, SBN 36603 GIRARDI KEESE 1126 Wilshire Boulevard Los Angeles, California 90017-1904  TELEPHONE NO.: 213/977-0211 FAX NO. (Optional): 213/481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): PLAINTIFFS		FOR COURT USE ONLY  <b>FILED</b> <b>LOS ANGELES SUPERIOR COURT</b>  <b>JUL 25 2011</b>  <b>REC'D</b> <b>JUL 25 2011</b> <b>FILING WINDOW</b> JOHN A. CLARKE, CLERK <i>[Signature]</i> BY ALISON ALBA, DEPUTY  CASE NUMBER: BC465842  D-51	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: Same as above CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central			
PLAINTIFF/PETITIONER: VERNON MAXWELL, et al., DEFENDANT/RESPONDENT: NATIONAL FOOTBALL LEAGUE, et al.,			
<b>REQUEST FOR DISMISSAL</b> <input type="checkbox"/> Personal Injury, Property Damage, or Wrongful Death <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other <input type="checkbox"/> Family Law <input type="checkbox"/> Eminent Domain <input checked="" type="checkbox"/> Other (specify):			
- A conformed copy will not be returned by the clerk unless a method of return is provided with the document. -			

## 1. TO THE CLERK: Please dismiss this action as follows:

a. (1) ☐ With prejudice (2) ☒ Without prejudiceb. (1) ☒ Complaint (2) ☐ Petition(3) ☐ Cross-complaint filed by (name):(4) ☐ Cross-complaint filed by (name):(5) ☐ Entire action of all parties and all causes of action(6) ☒ Other (specify): \*\*As to Plaintiff Tina Jones ONLY\*\*

on (date):

on (date):

## 2. (Complete in all cases except family law cases.)

☐ Court fees and costs were waived for a party in this case. (This information may be obtained from the clerk. If this box is checked, the declaration on the back of this form must be completed).

Date: JULY 25, 2011

THOMAS V. GIRARDI

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

\*If dismissal requested is of specified parties only of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

 (SIGNATURE)  
 Attorney or party without attorney for: Vernon Maxwell, et al.

☒ Plaintiff/Petitioner ☐ Defendant/Respondent  
☐ Cross-complainant

## 3. TO THE CLERK: Consent to the above dismissal is hereby given.\*\*

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)(SIGNATURE)  
Attorney or party without attorney for:

\*\* If a cross-complaint - or Response (Family Law) seeking affirmative relief - is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581 (i) or (j).

☐ Plaintiff/Petitioner ☐ Defendant/Respondent  
☐ Cross-Complainant

(To be completed by clerk)

4. ☒ Dismissal entered as requested on (date): JUL 25 20115. ☒ Dismissal entered on (date): as to only (name): above6. ☐ Dismissal not entered as requested for the following reasons (specify):7. a. ☐ Attorney or party without attorney notified on (date):
 b. ☐ Attorney or party without attorney not notified. Filing party failed to provide  
☐ a copy to be conformed ☐ means to return conformed copy

 Date: JUL 25 2011 Clerk, by *[Signature]* A. L. ALBA, Deputy

CIV-110

PLAINTIFF/PETITIONER: VERNON MAXWELL, et al.,	CASE NUMBER:
DEFENDANT/RESPONDENT: NATIONAL FOOTBALL LEAGUE, et al.,	

**Declaration Concerning Waived Court Fees**

The court has a statutory lien for waived fees and costs on any recovery of \$10,000 or more in value by settlement, compromise, arbitration award, mediation settlement, or other recovery. The court's lien must be paid before the court will dismiss the case.

1. The court waived fees and costs in this action for (name):
2. The person in item 1 (check one):
  - a. ☐ is not recovering anything of value by this action.
  - b. ☐ is recovering less than \$10,000 in value by this action.
  - c. ☐ is recovering \$10,000 or more in value by this action. (If item 2c is checked, item 3 must be completed.)
3. ☐ All court fees and costs that were waived in this action have been paid to the court (check one): ☐ Yes ☐ No

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: \_\_\_\_\_

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)

(SIGNATURE)

RECEIVED  
JAN 17 2011  
FEDERAL COURT  
SACRAMENTO  
CALIFORNIA

ORIGINAL

CIV-110

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>THOMAS V. GIRARDI</b> <b>GIRARDI KEESE</b> 1126 Wilshire Boulevard Los Angeles, California 90017-1904  TELEPHONE NO.: 213/977-0211 FAX NO. (Optional): 213/481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiffs		FOR COURT USE ONLY  <b>FILED</b> LOS ANGELES SUPERIOR COURT  JUL 25 2011  JOHN A. CLARKE, CLERK  BY ALISON ALBA, DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: same as above CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		
PLAINTIFF/PETITIONER: VERNON MAXWELL, et al., DEFENDANT/RESPONDENT: NATIONAL FOOTBALL LEAGUE, et al.,		
REQUEST FOR DISMISSAL <input type="checkbox"/> Personal Injury, Property Damage, or Wrongful Death <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other <input type="checkbox"/> Family Law <input type="checkbox"/> Eminent Domain <input checked="" type="checkbox"/> Other (specify): Products		CASE NUMBER: BC 465842  <b>BY FAX</b> D-51

- A conformed copy will not be returned by the clerk unless a method of return is provided with the document. -

## 1. TO THE CLERK: Please dismiss this action as follows:

a. (1) ☐ With prejudice (2) ☒ Without prejudiceb. (1) ☒ Complaint (2) ☐ Petition(3) ☐ Cross-complaint filed by (name):(4) ☐ Cross-complaint filed by (name):(5) ☐ Entire action of all parties and all causes of action(6) ☒ Other (specify): \*\*As to Plaintiffs, Otis Anderson and Wanda Anderson, his wife, ONLY\*\*

on (date):

on (date):

## 2. (Complete in all cases except family law cases.)

☐ Court fees and costs were waived for a party in this case. (This information may be obtained from the clerk. If this box is checked, the declaration on the back of this form must be completed).

Date: July 22, 2011

THOMAS V. GIRARDI

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

\*If dismissal requested is of specified parties only or of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

 (SIGNATURE)  
 Attorney or party without attorney for: Vernon Maxwell, et al.

☒ Plaintiff/Petitioner ☐ Defendant/Respondent  
☐ Cross-complainant

## 3. TO THE CLERK: Consent to the above dismissal is hereby given.\*\*

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)
 (SIGNATURE)  
 Attorney or party without attorney for:

\*\* If a cross-complaint - or Response (Family Law) seeking affirmative relief - is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581 (f) or (g).

☐ Plaintiff/Petitioner ☐ Defendant/Respondent  
☐ Cross-Complainant

(To be completed by clerk)

4. ☐ Dismissal entered as requested on (date):5. ☒ Dismissal entered on (date): JUL 25 2011 as to only (name): ABOVE6. ☐ Dismissal not entered as requested for the following reasons (specify):7. a. ☐ Attorney or party without attorney notified on (date):
 b. ☐ Attorney or party without attorney not notified. Filing party failed to provide  
☐ a copy to be conformed ☐ means to return conformed copy

Date: JUL 25 2011 Clerk, by A.L. ALBA

NOTICE SENT TO:

Luckasevic, Jason E.  
 Goldberg, Persky & White, P.C.  
 1030 Fifth Ave.  
 Pittsburgh PA 15219-4127

**FILED**  
 LOS ANGELES SUPERIOR COURT  
 CLERK'S STAMP

JUL 26 2011

JOHN A. CLARKE, CLERK  
 ALISON ALBA, DEPUTY

## SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

VERNON MAXWELL ET AL

Plaintiff(s),

VS.

NATIONAL FOOTBALL LEAGUE ET AL

Defendant(s).

CASE NUMBER

BC465842

NOTICE OF CASE  
MANAGEMENT CONFERENCE

TO THE PLAINTIFF(S)/ATTORNEY(S) FOR PLAINTIFF(S) OF RECORD:

You are ordered to serve this notice of hearing on all parties/attorneys of record forthwith, and meet and confer with all parties/attorneys of record about the matters to be discussed no later than 30 days before the Case Management Conference.

Your Case Management Conference has been scheduled for November 21, 2011 at 8:45 am in Dept. 51  
 at 111 North Hill Street, Los Angeles, California 90012.

**NOTICE TO DEFENDANT: THE SETTING OF THE CASE MANAGEMENT CONFERENCE DOES NOT EXEMPT THE  
 DEFENDANT FROM FILING A RESPONSIVE PLEADING AS REQUIRED BY LAW.**

Pursuant to California Rules of Court, rules 3.720-3.730, a completed Case Management Statement (Judicial Council form # CM-110) must be filed at least **15 calendar days** prior to the Case Management Conference. The Case Management Statement may be filed jointly by all parties/attorneys of record or individually by each party/attorney of record. You must be familiar with the case and be fully prepared to participate effectively in the Case Management Conference.

At the Case Management Conference, the Court may make pretrial orders including the following, but not limited to, an order establishing a discovery schedule; an order referring the case to Alternative Dispute Resolution (ADR); an order reclassifying the case; an order setting subsequent conference and the trial date; or other orders to achieve the goals of the Trial Court Delay Reduction Act (Gov. Code, section 68600 et seq.)

Notice is hereby given that if you do not file the Case Management Statement or appear and effectively participate at the Case Management Conference, the Court may impose sanctions pursuant to LASC Local Rule 7.13, Code of Civil Procedure sections 177.5, 575.2, 583.150, 583.360 and 583.410, Government Code Section 68608 (b), and California Rules of Court 2.2 et seq.

Date: July 26, 2011

## CERTIFICATE OF SERVICE

I, the below named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Notice of Case Management Conference upon each party or counsel named above:

[ ☒ ] by depositing in the United States mail at the courthouse in Los Angeles, California, one copy of the original filed herein in a separate sealed envelope to each address as shown above with postage thereon fully prepaid.

[ ☐ ] by personally giving the party notice upon filing the complaint.

Date: July 26, 2011

John A. Clarke, Executive Officer/Clerk

by Alison Alba, Deputy Clerk

LACV 132 (Rev. 09/07)  
 LASC Approved 10-03

Cal. Rules of Court, rule 3.720-3.730  
 LASC Local Rules, Chapter Seven

Ex A\_000109



51

CIV-110

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): THOMAS V. GIRARDI, SBN 36603 GIRARDI KEESE 1126 Wilshire Boulevard Los Angeles, California 90017-1904  TELEPHONE NO.: 213/977-0211 FAX NO. (Optional): 213/481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): PLAINTIFFS		FOR COURT USE ONLY  <b>FILED</b> LOS ANGELES SUPERIOR COURT  AUG 29 2011  JOHN A. CLARKE, CLERK BY ALISON ALBA, DEPUTY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: same as above CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		
PLAINTIFF/PETITIONER: VERNON MAXWELL, et al., DEFENDANT/RESPONDENT: NATIONAL FOOTBALL LEAGUE, et al.,		
REQUEST FOR DISMISSAL <input type="checkbox"/> Personal Injury, Property Damage, or Wrongful Death <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other <input type="checkbox"/> Family Law <input type="checkbox"/> Eminent Domain <input checked="" type="checkbox"/> Other (specify):		CASE NUMBER: BC465842  D-51

- A conformed copy will not be returned by the clerk unless a method of return is provided with the document. -

1. TO THE CLERK: Please dismiss this action as follows:
- a. (1) ☐ With prejudice (2) ☒ Without prejudice
- b. (1) ☒ Complaint (2) ☐ Petition
- (3) ☐ Cross-complaint filed by (name): on (date):
- (4) ☐ Cross-complaint filed by (name): on (date):
- (5) ☐ Entire action of all parties and all causes of action
- (6) ☒ Other (specify): \* \*\*As to Plaintiffs BRETT ROMBERG AND EMILY ROMBERG ONLY\*\*

2. (Complete in all cases except family law cases.)

- ☐ Court fees and costs were waived for a party in this case. (This information may be obtained from the clerk. If this box is checked, the declaration on the back of this form must be completed).

Date: August 29, 2011

THOMAS V. GIRARDI

(TYPE OR PRINT NAME OF ☒ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

\*If dismissal requested is of specified parties only of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

(SIGNATURE)  
 Attorney or party without attorney for: Vernon Maxwell, et al.

- ☒ Plaintiff/Petitioner ☐ Defendant/Respondent  
☐ Cross-complainant

3. TO THE CLERK: Consent to the above dismissal is hereby given.\*\*

Date:

(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY WITHOUT ATTORNEY)

\*\* If a cross-complaint - or Response (Family Law) seeking affirmative relief - is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 581 (i) or (j).

(SIGNATURE)  
 Attorney or party without attorney for:

- ☐ Plaintiff/Petitioner ☐ Defendant/Respondent  
☐ Cross-Complainant

(To be completed by clerk)

4. ☐ Dismissal entered as requested on (date):
5. ☒ Dismissal entered on (date): AUG 29 2011 as to only (name): above
6. ☐ Dismissal not entered as requested for the following reasons (specify):

7. a. ☐ Attorney or party without attorney notified on (date):
- b. ☐ Attorney or party without attorney not notified. Filing party failed to provide  
☐ a copy to be conformed ☐ means to return conformed copy

Date: AUG 29 2011

Clerk, by



PLAINTIFF/PETITIONER: VERNON MAXWELL, et al.,	CIV-110
DEFENDANT/RESPONDENT: NATIONAL FOOTBALL LEAGUE, et al.,	CASE NUMBER: BC465842

### Declaration Concerning Waived Court Fees

The court has a statutory lien for waived fees and costs on any recovery of \$10,000 or more in value by settlement, compromise, arbitration award, mediation settlement, or other recovery. The court's lien must be paid before the court will dismiss the case.

1. The court waived fees and costs in this action for (name):
2. The person in item 1 (check one):
  - a. ☐ is not recovering anything of value by this action.
  - b. ☐ is recovering less than \$10,000 in value by this action.
  - c. ☐ is recovering \$10,000 or more in value by this action. (If item 2c is checked, item 3 must be completed.)
3. ☐ All court fees and costs that were waived in this action have been paid to the court (check one): ☐ Yes ☐ No

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
(TYPE OR PRINT NAME OF ☐ ATTORNEY ☐ PARTY MAKING DECLARATION)

\_\_\_\_\_  
(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1128 WILSHIRE BLVD. LOS ANGELES, CA 900170008</b> TELEPHONE NO.: (213) 977-0211 FAX NO. (Optional): (213) 481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <b>Plaintiff</b>		POS-010 FOR COURT USE ONLY <b>FILED</b> SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES <b>SEP 27 2011</b> John A. Chaney, Executive Officer/Clerk By <u>Glenn Robinson</u> Deputy <b>GLORIETTA ROBINSON</b>
Los Angeles County Superior Court - Stanley Mosk STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: <b>BC465842</b>
PLAINTIFF/PETITIONER: <b>MAXWELL, ET AL.</b> DEFENDANT/RESPONDENT: <b>NFL, ET AL.</b>		Rel. No. or File No.: <b>2011211</b>
<b>PROOF OF SERVICE OF SUMMONS</b>		

(Separate proof of service is required for each party served.)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
  - ☒ summons
  - ☒ complaint
  - ☒ Alternative Dispute Resolution (ADR) package
  - ☐ Civil Case Cover Sheet (served in complex cases only)
  - ☐ cross-complaint
  - ☒ other (specify documents):  
**Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals**
- Party served (specify name of party as shown on documents served):  
**ALL AMERICAN SPORTS CORPORATION, D/B/A RIDDELL/ ALL AMERICAN**
  - ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
**PAUL MATHEWS - MANAGING AGENT/AUTHORIZED TO ACCEPT SERVICE**
- Address where the party was served: **CORPORATION SERVICE COMPANY**  
**2711 CENTERVILLE RD., # 400**  
**WILMINGTON, DE 19806**
- I served the party (check proper box)
  - ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **9/9/2011** (2) at (time): **3:30 PM**
  - ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

PETITIONER: MAXWELL, ET AL.	CASE NUMBER:
RESPONDENT: NFL, ET AL.	BC465842

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in Item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgment of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **ALL AMERICAN SPORTS CORPORATION, D/B/A RIDDELL/ ALL AMERICAN**  
under the following Code of Civil Procedure section:
- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.48 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: **Daniel Newcomb - Janney and Janney Attorney Service, Inc.**
- b. Address: **1545 Wilshire Blvd., #311 Los Angeles, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: **\$ 145.10**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 9/14/2011



**Janney and Janney Attorney Service, Inc.**  
1545 Wilshire Blvd., #311  
Los Angeles, CA 90017  
(213) 628-6338

**Daniel Newcomb**  
(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1126 WILSHIRE BLVD. LOS ANGELES, CA 900170000</b> TELEPHONE NO.: (213) 977-0211 FAX NO. (Optional): (213) 481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff;		POS-010 FOR COURT USE ONLY <div style="text-align: center; font-weight: bold; font-size: 1.2em;">FILED</div> SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES <div style="text-align: center; font-weight: bold; font-size: 1.2em;">SEP 27 2011</div> John A. Clang, Judge By <u>Gloryetta Robinson</u> Deputy
<b>Los Angeles County Superior Court - Stanley Mosk</b> STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: <div style="text-align: right;">BC465842 <span style="font-size: 1.5em;">51</span></div>
PLAINTIFF/PETITIONER: MAXWELL, ET AL. DEFENDANT/RESPONDENT: NFL, ET AL.		Ref. No. or File No.: <b>2011211</b>
<b>PROOF OF SERVICE OF SUMMONS</b>		

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
  - a. ☒ summons
  - b. ☒ complaint
  - c. ☒ Alternative Dispute Resolution (ADR) package
  - d. ☐ Civil Case Cover Sheet (served in complex cases only)
  - e. ☐ cross-complaint
  - f. ☒ other (specify documents):  
 Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals
3. a. Party served (specify name of party as shown on documents served):  
**EASTON- BELL SPORTS, INC.**
- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
**BECKY DeGEORGE - PERSON AUTHORIZED TO ACCEPT SERVICE**
4. Address where the party was served: **CSC LAWYERS**  
**2730 GATEWAY OAKS DR., # 100**  
**SACRAMENTO, CA 95833**
5. I served the party (check proper box)
  - a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **9/9/2011** (2) at (time): **3:19 PM**
  - b. ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

PETITIONER: <b>MAXWELL, ET AL.</b>	CASE NUMBER: <b>BC465842</b>
RESPONDENT: <b>NFL, ET AL.</b>	

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid.
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **EASTON- BELL SPORTS, INC.**  
under the following Code of Civil Procedure section:
- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: **GARRY DICK - JANNEY & JANNEY ATTORNEY SERVICE**
- b. Address: **1545 WILSHIRE BLVD., STE 311 LOS ANGELES, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: \$ 168.00
- e. I am:
- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☐ employee ☒ independent contractor.
- (ii) Registration No.: **08-013**
- (iii) County: **PLACER**

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **9/14/2011**



**JANNEY & JANNEY ATTORNEY SERVICE**  
**1545 WILSHIRE BLVD., STE 311**  
**LOS ANGELES, CA 90017**  
**(213) 628-6338**

**GARRY DICK**

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

SIGNATURE

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, number, and address)		FOR COURT USE ONLY	
THOMAS V. GIRARDI GIRARDI AND KEESE 1126 WILSHIRE BLVD. LOS ANGELES, CA 900170000		SBN: 36603	
TELEPHONE NO.: (213) 977-0211		FAX NO. (Optional): (213) 481-1558	
E-MAIL ADDRESS (Optional):		FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES	
ATTORNEY FOR (Name): Plaintiff:		SEP 27 2011	
Los Angeles County Superior Court - Stanley Mosk		John A. Clark, County Clerk/Clerk	
STREET ADDRESS: 111 N. Hill St.		By <u>[Signature]</u> Deputy	
MAILING ADDRESS:		GLORIETTA ROBINSON	
CITY AND ZIP CODE: Los Angeles, CA 90012		CASE NUMBER:	
BRANCH NAME: Central		BC466842	
PLAINTIFF/PETITIONER: MAXWELL, ET AL.		Red. No. or File No.: 2011211	
DEFENDANT/RESPONDENT: NFL, ET AL.		51	
PROOF OF SERVICE OF SUMMONS			

(Separate proof of service is required for each party served.)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
  - ☒ summons
  - ☒ complaint
  - ☒ Alternative Dispute Resolution (ADR) package
  - ☐ Civil Case Cover Sheet (served in complex cases only)
  - ☐ cross-complaint
  - ☒ other (specify documents):  
Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals
- Party served (specify name of party as shown on documents served):  
EASTON- BELL SPORTS, LLC.
  - ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
PAUL MATHEWS - MANAGING AGENT/AUTHORIZED TO ACCEPT SERVICE
- Address where the party was served: CORPORATION SERVICE COMPANY  
2711 CENTERVILLE RD., # 400  
WILMINGTON, DE 19808
- I served the party (check proper box)
  - ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 9/9/2011 (2) at (time): 3:30 PM
  - ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.



PETITIONER: <b>MAXWELL, ET AL.</b>	CASE NUMBER:
RESPONDENT: <b>NFL, ET AL.</b>	<b>BC466842</b>

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **EASTON- BELL SPORTS, LLC.**  
under the following Code of Civil Procedure section:
- |   |   |
|---|---|
| <input type="checkbox"/> 418.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown)       |
| <input type="checkbox"/> 418.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                                     |
| <input type="checkbox"/> 418.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                       |
| <input type="checkbox"/> 418.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                         |
| <input type="checkbox"/> 418.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                                  |
|   | <input checked="" type="checkbox"/> other: <b>LIMITED LIABILITY COMPANY</b> |

7. Person who served papers

- a. Name: **Daniel Newcomb - Janney and Janney Attorney Service, Inc.**
- b. Address: **1545 Wilshire Blvd., #311 Los Angeles, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: \$ **76.50**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server.
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **9/14/2011**



**Janney and Janney Attorney Service, Inc.**  
**1545 Wilshire Blvd., #311**  
**Los Angeles, CA 90017**  
**(213) 628-6338**

**Daniel Newcomb**  
(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State, Number, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1126 WILSHIRE BLVD. LOS ANGELES, CA 900170000</b> TELEPHONE NO.: (213) 977-0211 FAX NO. (Optional): (213) 481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff:		FOR COURT USE ONLY <div style="text-align: center;"> <b>FILED</b>          SUPERIOR COURT OF CALIFORNIA          COUNTY OF LOS ANGELES          SEP 27 2011          John A. Clark, Executive Officer/Clerk          By <u>GLORIETTA ROBINSON</u>, Deputy       </div>	
Los Angeles County Superior Court - Stanley Mosk STREET ADDRESS: 111 N. HIN St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: BC465842	
PLAINTIFF/PETITIONER: MAXWELL, ET AL. DEFENDANT/RESPONDENT: NFL, ET AL.		Ref. No. or File No.: 2011211	
<b>PROOF OF SERVICE OF SUMMONS</b>			

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of:

- a. ☒ summons  
 b. ☒ complaint  
 c. ☒ Alternative Dispute Resolution (ADR) package  
 d. ☐ Civil Case Cover Sheet (served in complex cases only)  
 e. ☐ cross-complaint  
 f. ☒ other (specify documents):

Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals

3. a. Party served (specify name of party as shown on documents served):

EB SPORT CORP.

- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):

PAUL MATHEWS - MANAGING AGENT/AUTHORIZED TO ACCEPT SERVICE

4. Address where the party was served: CORPORATION SERVICE COMPANY

2711 CENTERVILLE RD., # 400  
 WILMINGTON, DE 19808

5. I served the party (check proper box)

- a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 9/9/2011 (2) at (time): 3:30 PM

- b. ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):

- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.  
 (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.  
 (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.  
 (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.  
 (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

PETITIONER: <b>MAXWELL, ET AL.</b>	CASE NUMBER:
RESPONDENT: <b>NFL, ET AL.</b>	<b>BC485842</b>

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in Item 2 to the party, to the address shown in Item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **EB SPORT CORP.**

under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.80 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.48 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: **Daniel Newcomb - Janney and Janney Attorney Service, Inc.**
- b. Address: **1545 Wilshire Blvd., #311 Los Angeles, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: **\$ 76.50**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **9/14/2011**



**Janney and Janney Attorney Service, Inc.**  
**1545 Wilshire Blvd., #311**  
**Los Angeles, CA 90017**  
**(213) 628-6338**

**Daniel Newcomb**  
 (NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1125 WILSHIRE BLVD. LOS ANGELES, CA 900170000</b> TELEPHONE NO.: (213) 977-0211 FAX NO. (Optional): (213) 481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff:		FOR COURT USE ONLY <b>FILED</b> <b>SUPERIOR COURT OF CALIFORNIA</b> <b>COUNTY OF LOS ANGELES</b> <b>SEP 27 2011</b> By <u>John A. Clark</u> CLERK OF COURT	
Los Angeles County Superior Court - Stanley Mosk STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: <b>BC465642</b>	
PLAINTIFF/PETITIONER: <b>MAXWELL, ET AL.</b> DEFENDANT/RESPONDENT: <b>NFL, ET AL.</b>		Ref. No. or File No.: <b>2011211</b>	
<b>PROOF OF SERVICE OF SUMMONS</b>			

(Separate proof of service is required for each party served.)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
  - ☒ summons
  - ☒ complaint
  - ☒ Alternative Dispute Resolution (ADR) package
  - ☐ Civil Case Cover Sheet (served in complex cases only)
  - ☐ cross-complaint
  - ☒ other (specify documents):  
**Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals**
- Party served (specify name of party as shown on documents served):  
**NATIONAL FOOTBALL LEAGUE**
  - ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
**DOUG PAOLETTI - PERSON AUTHORIZED TO ACCEPT SERVICE**
- Address where the party was served: **NFL HEADQUARTERS**  
**280 PARK AVE**  
**NEW YORK, NY 10017**
- I served the party (check proper box)
  - ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **9/12/2011** (2) at (time): **4:33 PM**
  - ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

Page 1 of 2

PETITIONER: MAXWELL, ET AL.

CASE NUMBER:

RESPONDENT: NFL, ET AL.

BC465842

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **NATIONAL FOOTBALL LEAGUE**  
under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: **GERALD MURRAY - JANNEY AND JANNEY ATTORNEY SERVICE, INC.**
- b. Address: **1545 WILSHIRE BLVD., #311 LOS ANGELES, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: \$ **329.38**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.: **LIC# 0872285**
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **9/14/2011**



**JANNEY AND JANNEY ATTORNEY SERVICE, INC.**  
**1545 WILSHIRE BLVD., #311**  
**LOS ANGELES, CA 90017**  
**(213) 628-6338**

**GERALD MURRAY**

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)



POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1126 WILSHIRE BLVD. LOS ANGELES, CA 900170000</b> TELEPHONE NO.: (213) 977-0211 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff:		SBN: 36603 FAX NO. (Optional): (213) 481-1564 <b>FILED</b> <b>SUPERIOR COURT OF CALIFORNIA</b> <b>COUNTY OF LOS ANGELES</b> <b>SEP 27 2011</b> John A. Clark, Judge/Clerk By <u>Glenn A. Robinson</u> , Deputy
Los Angeles County Superior Court - Stanley Mosk STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: BC465842 51
PLAINTIFF/PETITIONER: MAXWELL, ET AL. DEFENDANT/RESPONDENT: NFL, ET AL.		Ref. No. or File No.: 2011211
PROOF OF SERVICE OF SUMMONS		

(Separate proof of service is required for each party served.)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
  - ☒ summons
  - ☒ complaint
  - ☒ Alternative Dispute Resolution (ADR) package
  - ☐ Civil Case Cover Sheet (served in complex cases only)
  - ☐ cross-complaint
  - ☒ other (specify documents):  
 Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals
- Party served (specify name of party as shown on documents served):  
**NFL PROPERTIES, LLC.**
  - ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
**SCOTT LaSCALA - MANAGING AGENT/AUTHORIZED TO ACCEPT SERVICE**
- Address where the party was served: **CORPORATION TRUST CENTER**  
**1209 ORANGE ST.**  
**WILMINGTON, DE 19801**
- I served the party (check proper box)
  - ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 9/9/2011 (2) at (time): 2:50 PM
  - ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

Page 1 of 2



PETITIONER: MAXWELL, ET AL.	CASE NUMBER:
RESPONDENT: NFL, ET AL.	BC465842

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **NFL PROPERTIES, LLC.**  
under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input type="checkbox"/> 416.10 (corporation)                     | <input type="checkbox"/> 415.95 (business organization, form unknown)       |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                                     |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                       |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                         |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                                  |
|   | <input checked="" type="checkbox"/> other: <b>LIMITED LIABILITY COMPANY</b> |

7. Person who served papers

- a. Name: **Daniel Newcomb - Janney and Janney Attorney Service, Inc.**
- b. Address: **1545 Wilshire Blvd., #311 Los Angeles, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: **\$ 276.50**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 9/14/2011



**Janney and Janney Attorney Service, Inc.**  
1545 Wilshire Blvd., #311  
Los Angeles, CA 90017  
(213) 628-6338

Daniel Newcomb

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

[Signature]

(SIGNATURE)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Street address, telephone number, and address)		FOR COURT USE ONLY	
THOMAS V. GIRARDI GIRARDI AND KEESE 1126 WILSHIRE BLVD. LOS ANGELES, CA 900170000		SBN: 36603	
TELEPHONE NO.: (213) 977-0211		FAX NO. (Optional): (213) 481-1554	
E-MAIL ADDRESS (Optional):		<b>FILED</b> SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES SEP 27 2011 John A. Clark, County Clerk By <u>Glorietta Robinson</u> Deputy	
ATTORNEY FOR (Name: Plaintiff):			
Los Angeles County Superior Court - Stanley Mosk			
STREET ADDRESS: 111 N. Hill St.			
MAILING ADDRESS:			
CITY AND ZIP CODE: Los Angeles, CA 90012			
BRANCH NAME: Central			
PLAINTIFF/PETITIONER: MAXWELL, ET AL.		CASE NUMBER:	
DEFENDANT/RESPONDENT: NFL, ET AL.		BC465842 . 57	
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.: 2011211	

(Separate proof of service is required for each party served.)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
  - ☒ summons
  - ☒ complaint
  - ☒ Alternative Dispute Resolution (ADR) package
  - ☐ Civil Case Cover Sheet (served in complex cases only)
  - ☐ cross-complaint
  - ☒ other (specify documents):  
Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals
- Party served (specify name of party as shown on documents served):  
RBG HOLDINGS CORP.
  - ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
PAUL MATHEWS - MANAGING AGENT/AUTHORIZED TO ACCEPT SERVICE
- Address where the party was served: CORPORATION SERVICE CO.  
2711 CENTERVILLE RD., #400  
WILMINGTON, DE 19808
- I served the party (check proper box)
  - ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 9/13/2011 (2) at (time): 3:45 PM
  - ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

PETITIONER: MAXWELL, ET AL

RESPONDENT: NFL, ET AL.

CASE NUMBER:

BC465842

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgment of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **RBG HOLDINGS CORP.**  
under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: **Daniel Newcomb - Janney and Janney Attorney Service, Inc.**
- b. Address: **1545 Wilshire Blvd., #311 Los Angeles, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: **\$ 328.50**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.:
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

or

9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 9/14/2011



**Janney and Janney Attorney Service, Inc.**  
1545 Wilshire Blvd., #311  
Los Angeles, CA 90017  
(213) 628-6338

**Daniel Newcomb**

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1126 WILSHIRE BLVD. LOS ANGELES, CA 900170000</b> TELEPHONE NO.: (213) 977-0211 FAX NO. (Optional): (213) 481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff:		POS-010 FOR COURT USE ONLY <b>FILED</b> SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES SEP 27 2011 John A. Clark, Associate Clerk By <u>GLADYS TA ROBINSON</u> Deputy
Los Angeles County Superior Court - Stanley Mosk STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: BC465842 51
PLAINTIFF/PETITIONER: MAXWELL, ET AL. DEFENDANT/RESPONDENT: NFL, ET AL.		Ref. No. or File No.: 2011211
PROOF OF SERVICE OF SUMMONS		

(Separate proof of service is required for each party served.)

- At the time of service I was at least 18 years of age and not a party to this action.
- I served copies of:
  - ☒ summons
  - ☒ complaint
  - ☒ Alternative Dispute Resolution (ADR) package
  - ☐ Civil Case Cover Sheet (served in complex cases only)
  - ☐ cross-complaint
  - ☒ other (specify documents):  
 Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals
- Party served (specify name of party as shown on documents served):  
**RIDDELL, INC., D/B/A RIDDELL SPORTS GROUP, INC.**
  - ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):  
**DEANNA DILLON - PERSON AUTHORIZED TO ACCEPT SERVICE**
- Address where the party was served: **ILLINOIS CORPORATION SERVICE**  
**801 ADLAI STEVENSON DR.**  
**SPRINGFIELD, IL 62703**
- I served the party (check proper box)
  - ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 9/12/2011 (2) at (time): 2:20 PM
  - ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
    - ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
    - ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
    - ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
    - ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
    - ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

PETITIONER: <b>MAXWELL, ET AL.</b>	CASE NUMBER:
RESPONDENT: <b>NFL, ET AL.</b>	<b>BC465842</b>

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in Item 2 to the party, to the address shown in Item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **RIDDELL, INC., D/B/A RIDDELL SPORTS GROUP, INC.**

under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: **GREG WILLING - JANNEY AND JANNEY ATTORNEY SERVICE, INC.**
- b. Address: **1545 WILSHIRE BLVD., #311 LOS ANGELES, CA 90017**
- c. Telephone number: **(213) 628-6338**
- d. The fee for service was: **\$ 276.50**
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server;
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.: **129-261847**
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: **9/14/2011**



**JANNEY AND JANNEY ATTORNEY SERVICE, INC.**  
**1545 WILSHIRE BLVD., #311**  
**LOS ANGELES, CA 90017**  
**(213) 628-6338**

**GREG WILLING**

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) <b>THOMAS V. GIRARDI</b> <b>GIRARDI AND KEESE</b> <b>1126 WILSHIRE BLVD. LOS ANGELES, CA 900170009</b> TELEPHONE NO: (213) 977-0211 FAX NO. (Optional): (213) 481-1554 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Plaintiff:		POS-010 FOR COURT USE ONLY <b>FILED</b> <b>SUPERIOR COURT OF CALIFORNIA</b> <b>COUNTY OF LOS ANGELES</b> <b>SEP 27 2011</b> John A. Clark, Executive Officer/Clerk By <u>GEORGETTA ROBINSON</u> Deputy
Los Angeles County Superior Court - Stanley Mosk STREET ADDRESS: 111 N. Hill St. MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Central		CASE NUMBER: <b>BC485842</b>
PLAINTIFF/PETITIONER: MAXWELL, ET AL. DEFENDANT/RESPONDENT: NFL, ET AL.		Ref. No. or File No.: <b>2011211</b>
<b>PROOF OF SERVICE OF SUMMONS</b>		<b>51</b>

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.

2. I served copies of:

- a. ☒ summons  
 b. ☒ complaint  
 c. ☒ Alternative Dispute Resolution (ADR) package  
 d. ☐ Civil Case Cover Sheet (served in complex cases only)  
 e. ☐ cross-complaint  
 f. ☒ other (specify documents):

Civil Case Cover Sheet; Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment; Voluntary Efficient Litigation Stipulations; Request for Dismissals

3. a. Party served (specify name of party as shown on documents served):

RIDDELL, INC., D/B/A RIDDELL SPORTS GROUP, INC.

- b. ☒ Person (other than the party in Item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):

DEANNA DILLON - PERSON AUTHORIZED TO ACCEPT SERVICE

4. Address where the party was served: ILLINOIS CORPORATION SERVICE

801 ADLAI STEVENSON DR.

SPRINGFIELD, IL 62703

5. I served the party (check proper box)

- a. ☒ by personal service. I personally delivered the documents listed in Item 2 to the party or person authorized to receive service of process for the party (1) on (date): 9/12/2011 (2) at (time): 2:20 PM

- b. ☐ by substituted service. On (date): at (time): I left the documents listed in Item 2 with or in the presence of (name and title or relationship to person indicated in Item 3b):

- (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.  
 (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.  
 (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.  
 (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.  
 (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.



PETITIONER: MAXWELL, ET AL.  RESPONDENT: NFL, ET AL.	CASE NUMBER:  BC466842
--	------------------------------

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in Item 2 to the party, to the address shown in Item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed *Notice and Acknowledgment of Receipt*.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): RIDDELL, INC., D/B/A RIDDELL SPORTS GROUP, INC.

under the following Code of Civil Procedure section:

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation)          | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation)             | <input type="checkbox"/> 416.60 (minor)                               |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee)                 |
| <input type="checkbox"/> 416.40 (association or partnership)      | <input type="checkbox"/> 416.90 (authorized person)                   |
| <input type="checkbox"/> 416.50 (public entity)                   | <input type="checkbox"/> 415.46 (occupant)                            |
|   | <input type="checkbox"/> other:                                       |

7. Person who served papers

- a. Name: GREG WILLING - JANNEY AND JANNEY ATTORNEY SERVICE, INC.
- b. Address: 1545 WILSHIRE BLVD., #311 LOS ANGELES, CA 90017
- c. Telephone number: (213) 828-6338
- d. The fee for service was: \$ 276.50
- e. I am:

- (1) ☒ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☐ registered California process server:
- (i) ☐ owner ☐ employee ☐ independent contractor.
- (ii) Registration No.: 129-261847
- (iii) County:

8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 9/14/2011



JANNEY AND JANNEY ATTORNEY SERVICE, INC.  
1545 WILSHIRE BLVD., #311  
LOS ANGELES, CA 90017  
(213) 828-6338

GREG WILLING

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(SIGNATURE)

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Manuel Real and the assigned discovery Magistrate Judge is Margaret A. Nagle.

The case number on all documents filed with the Court should read as follows:

**CV11- 8394 R (MANx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

=====

**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

☒ **Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

☐ **Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

☐ **Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself <input type="checkbox"/> )  VERNON MAXWELL, et al. (See attachment)		<b>DEFENDANTS</b>  NATIONAL FOOTBALL LEAGUE, et al. (See attachment)																									
<b>(b)</b> Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  (See attachment)		Attorneys (If Known)  (See attachment)																									
<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)		<b>III. CITIZENSHIP OF PRINCIPAL PARTIES -</b> For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%"><thead><tr><th></th><th>PTF</th><th>DEF</th><th></th><th>PTF</th><th>DEF</th></tr></thead><tbody><tr><td>Citizen of This State</td><td><input type="checkbox"/> 1</td><td><input type="checkbox"/> 1</td><td>Incorporated or Principal Place of Business in this State</td><td><input type="checkbox"/> 4</td><td><input type="checkbox"/> 4</td></tr><tr><td>Citizen of Another State</td><td><input type="checkbox"/> 2</td><td><input type="checkbox"/> 2</td><td>Incorporated and Principal Place of Business in Another State</td><td><input type="checkbox"/> 5</td><td><input type="checkbox"/> 5</td></tr><tr><td>Citizen or Subject of a Foreign Country</td><td><input type="checkbox"/> 3</td><td><input type="checkbox"/> 3</td><td>Foreign Nation</td><td><input type="checkbox"/> 6</td><td><input type="checkbox"/> 6</td></tr></tbody></table>			PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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<b>IV. ORIGIN</b> (Place an X in one box only.) <input type="checkbox"/> 1 Original Proceeding <input checked="" type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): <input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge																											
<b>V. REQUESTED IN COMPLAINT:</b> JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.) <b>CLASS ACTION</b> under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <b>MONEY DEMANDED IN COMPLAINT:</b> \$ \$25,000+ (according to proof)																											
<b>VI. CAUSE OF ACTION</b> (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) (See attachment)																											
<b>VII. NATURE OF SUIT</b> (Place an X in one box only.) <table style="width:100%"><thead><tr><th>OTHER STATUTES</th><th>CONTRACT</th><th>TORTS</th><th>TORTS</th><th>PRISONER</th><th>LABOR</th></tr></thead><tbody><tr><td><input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. 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CV11-08394

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA**  
**CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes  
 If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes  
 If yes, list case number(s): (Please see separately filed Notice of Related Cases regarding cases being removed concurrently with this case.)

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or  
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or  
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.  
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
(See attachment)	(See attachment)

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.  
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
(See attachment)	(See attachment)

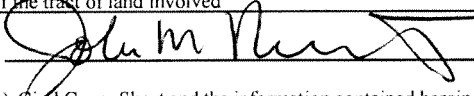
- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	(See attachment)

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

**Note:** In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER):  Date October 11, 2011

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

**Key to Statistical codes relating to Social Security Cases:**

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))

Attachment to Civil Cover Sheet for Maxwell, et al. v. National Football League, et al.Section I:

PLAINTIFFS	DEFENDANTS
<p>VERNON MAXWELL; BRODERICK JONES; KENDALL WILLIAMS and INGRID WILLIAMS, his wife; MIKE C. RICHARDSON; RENARD YOUNG and VANESSA YOUNG, his wife; LONZELL HILL and LANITA HILL, his wife; GEORGE VISGER and KRISTIE VISGER, his wife; TERRY WRIGHT; NEWTON WILLIAMS; DUANE GALLOWAY; GEORGE JAMISON and ARNELLA JAMISON, his wife; BRYAN HOOKS; FRED McNEILL and TIA McNEILL, his wife; REGINALD ROGERS, SR.; MELVIN JENKINS and JAVONI JENKINS, his wife; ANTONIO GIBSON and BETTY GIBSON, his wife; ALVIN MOORE and ODETTA MOORE, his wife; LYVONIA A. MITCHELL; KIRK CAMERON JONES; JAMES E. ROBBINS and SHANEETA ROBBINS, his wife; ROBERT J. FREDRICKSON and BARBARA FREDRICKSON, his wife; CHARLES E. MILLER; EDWARD P. LEE and SUSAN LEE, his wife; PATRICK HEENAN and SHARRON HEENAN, his wife; TOBY L. WRIGHT; KELLY KIRCHBAUM; JAMES HOOD and BONITA HOOD, his wife; RICHARD MERCIER and YADIRA MERCIER, his wife; BRETT ROMBERG and EMILY ROMBERG, his wife; STEVE KORTE and KARELIS KORTE, his wife; JOE HARRIS and LYDIA HARRIS, his wife; RODNEY HAMPTON and ANDETRIA HAMPTON, his wife; LEWIS D. TILLMAN and KATHY TILLMAN, his wife; LARRY KAMINSKI and LINDA KAMINSKI, his wife; DAVID KOCOUREK and MARY LEE KOCOUREK, his wife; ROBERT WEATHERS and DENISE WEATHERS, his wife; WAYNE HAWKINS and SHARON HAWKINS, his wife; ANTHONY HARGAIN; EDWARD PAYTON and RICA PAYTON, his wife; WILLIAM H. MANDLEY and TERESA MANDLEY, his wife; SHANTE CARVER; GEORGE</p>	<p>NATIONAL FOOTBALL LEAGUE; NFL PROPERTIES LLC; RIDDELL, INC. d/b/a RIDDELL SPORTS GROUP, INC.; ALL AMERICAN SPORTS CORPORATION, d/b/a RIDDELL/ALL AMERICAN; RIDDELL SPORTS GROUP, INC.; EASTON-BELL SPORTS, INC.; EASTON-BELL SPORTS, LLC; EB SPORTS CORP.; and RBG HOLDINGS CORP.</p>



GOEDDEKE and GENEVA GOEDDEKE, his wife; JAMES MICHAEL SCHNITKER and BEVERLEE SCHNITKER, his wife; CHRISTOPHER CALLOWAY; THOMAS C. RANDOLPH, II and EVELYN RANDOLPH, his wife; GARY JONES and TINA JONES, his wife; OTTIS ANDERSON and WANDA ANDERSON, his wife; LEONARD RUSSELL and TASHA RUSSELL, his wife; RORY GRAVES; DAVID M. WHITE and MONICA WHITE, his wife; PHILIP SMITH and GAIL SMITH; W. VERNON DEAN; ANTHONY COVINGTON; ANTHONY JONES and VALERIE JONES, his wife; STEVE REESE and MARILYN REESE, his wife; DONALD BESSELLIEU; HAROLD L. JACKSON and CAROLYN JACKSON, his wife; TODD JOHNSON and SHANNON JOHNSON, his wife; CHRIS GOODE; BRUCE WALKER and VANISHA WALKER, his wife; DERRICK S. REYNOLDS; DAVID LEWIS and BONNIE LEWIS, his wife; RONNIE LIPPETT and SHERYL LIPPETT, his wife; ROLAND JAMES and CARMEL JAMES, his wife; MARK S. DUPER; BRIAN INGRAM and SARCA INGRAM, his wife; ANTHONY COLLINS and TRUDY COLLINS, his wife; STEVE NELSON and ANGELA NELSON, his wife; JAMES E. WILLIS and SHALANE WILLIS, his wife; ANTHONY HANCOCK and PAULA HANCOCK, his wife; JEFF BURRIS; WILLIAM C. BRADLEY and SUSAN BRADLEY, his wife; KERRY GOODE and TANJA GOODE, his wife; RAYMOND CLAYBORN and KIMBERLEY CLAYBORN, his wife; STEVEN ZABEL and SUSAN ZABEL, his wife.



<b><i>Attorneys for Plaintiffs:</i></b>	<b><i>Attorneys for Defendants National Football League and NFL Properties LLC:</i></b>
<p>GIRARDI   KEESE  THOMAS V. GIRARDI  1126 Wilshire Boulevard  Los Angeles, CA 90017  Telephone: (213) 977-0211  Facsimile: (213) 481-1554</p> <p>RUSSOMANNO &amp; BORRELLO, P.A.  HERMAN RUSSOMANNO  ROBERT BORRELLO  150 West Flagler Street - PH 2800  Miami, FL 33130  Telephone: (305) 373-2101  Facsimile: (305) 373-2103</p> <p>GOLDBERG, PERSKY &amp; WHITE, P.C.  JASON E. LUCKASEVIC  1030 Fifth Avenue  Pittsburgh, PA 15219  Telephone: (412) 471-3980  Facsimile: (412) 471-8308</p>	<p>MUNGER, TOLLES &amp; OLSON LLP  RONALD L. OLSON  JOHN M. RAPPAPORT  355 South Grand Avenue, Thirty-Fifth Floor  Los Angeles, CA 90071-1560  Telephone: (213) 683-9100  Facsimile: (213) 687-3702</p> <p><i>(Pro Hac Vice applications to be filed)</i>  PAUL, WEISS, RIFKIND, WHARTON &amp;  GARRISON LLP  BRAD S. KARP  THEODORE V. WELLS, JR.  LYNN B. BAYARD  1285 Avenue of the Americas  New York, NY 10019-6064  Telephone: (212) 373-3000  Facsimile: (212) 757-3990</p>

**Section VI:**

United States Civil Statute: Labor Management Relations Act, 29 U.S.C. § 141, *et seq.*; suit for negligence, “negligence-monopolist,” fraud and loss of consortium against the National Football League and NFL Properties LLC, arising from and/or substantially dependent on collective bargaining agreements.

**Section IX:**

<b><u>a. Plaintiffs:</u></b>	
<b><i>California Counties:</i></b>	<b><i>States other than California</i></b>
Contra Costa Los Angeles Riverside Sacramento	Alabama Arizona Colorado Florida Georgia Indiana Kentucky Louisiana Maryland Massachusetts Michigan Mississippi Nevada New Jersey New York North Carolina Ohio Pennsylvania Tennessee Texas Virginia Washington

**b. Defendants:**

Plaintiffs allege that Defendants reside as follows:

National Football League is an unincorporated association with its headquarters located in the State of New York. The National Football League regularly conducts business in California.

NFL Properties, LLC is a limited liability company organized and existing under the laws of the State of Delaware with its headquarters in the State of New York. NFL Properties, LLC regularly conducts business in California.

Riddell, Inc. (*d/b/a* Riddell Sports Group, Inc.) is a corporation organized and existing under the laws of the State of Illinois. Riddell, Inc. regularly conducts business in California.

All American Sports Corporation, *d/b/a* Riddell/All American, is a corporation organized and existing under the laws of the State of Delaware. All American Sports Corporation regularly conducts business in California.

Riddell Sports Group, Inc. is a Delaware corporation with its principal place of business in Texas. Riddell Sports Group, Inc. regularly conducts business in California.

Easton-Bell Sports, Inc. is a California corporation, incorporated in Delaware with a principal place of business in California.

Easton-Bell Sports, LLC is incorporated in Delaware, with a principal place of business in New York. Easton-Bell Sports, LLC regularly conducts business in California.

EB Sports Corp. is a Delaware corporation with its principal place of business in California.

RBG Holdings Corp. is a Delaware corporation with its principal place of business in California.

**c. Claims**

On information and belief, as of this time, and based on the allegations set forth in the Complaint, all of the claims against the National Football League and NFL Properties LLC arose in New York, and possibly other states.